

# **EXHIBIT 14**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRITAX CHILD SAFETY, INC.,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 5:17-cv-02724-JFL
v.	)	
	)	
NUNA INTERNATIONAL B.V. and	)	
NUNA BABY ESSENTIALS, INC.,	)	
	)	
Defendants.	)	

**REVISED INITIAL EXPERT WITNESS REPORT OF  
MR. ANDREW BOWMAN REGARDING INVALIDITY<sup>1</sup>**

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<sup>1</sup> The Initial Expert Witness Disclosures of Andrew Bowman were initially served on Britax on April 3, 2020. In accordance with an agreement between the parties on April 22, 2020, these revised disclosures are now provided.

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<b>Def. Exhibit No.</b>	<b>Description</b>
12	U.S. Patent No. 9,499,074 to Strong et al. (“’074 patent”)
13	U.S. Patent No. 9,586,504 to Strong et al. (“’504 patent”)
54	Britax Child Safety, Inc., “BRITAX Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-offs” (Jan. 6, 2011), available at <a href="https://youtu.be/OrL4oZaEwuk">https://youtu.be/OrL4oZaEwuk</a> (“NUNA0005232”)
55	U.S. Patent Publication No. 2011/0227383 to Strong (“ <i>Strong</i> ”)
88	U.S. Patent No. 7,901,003 to Meeker et al. (“ <i>Meeker</i> ”)
89	U.S. Patent No. 6,508,510 to Yamazaki (“ <i>Yamazaki</i> ”)
91	Britax Boulevard 70 CS User Guide (“User Guide”)
100	Prosecution History of U.S. Patent Application No. 14/063,807 (“’074 Prosecution History”)
101	Prosecution History of U.S. Patent Application No. 15/294,242 (“’504 Prosecution History”)
102	Prosecution History of U.S. Patent Application No. 12/725,968 (“ <i>Strong</i> Prosecution History”)
103	Plaintiff’s Supplemental Disclosure of Infringement Contentions (Oct. 18, 2019) (“Britax’s Supplemental Infringement Contentions”)
104	Deposition Transcript of Curtis Strong (Mar. 4, 2020) (“Strong Tr.”)
105	Britax Child Safety, Inc., video titled “BRITAX Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and One Lock-off” (Jan. 6, 2011), available at <a href="https://youtu.be/F6V_kscSxKE">https://youtu.be/F6V_kscSxKE</a> (“NUNA0005231”)
106	Britax Child Safety, Inc., video titled “BRITAX Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and One Lock-off” (Jan. 6, 2011), available at <a href="https://youtu.be/7koBM82iYlw">https://youtu.be/7koBM82iYlw</a> (“NUNA0005233”)
107	Britax Child Safety, Inc., video titled “BRITAX Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-offs” (Jan. 6, 2011), available at <a href="https://youtu.be/I1gD5S-9NFE">https://youtu.be/I1gD5S-9NFE</a> (“NUNA0005234”)
108	Curriculum Vitae of Andrew Bowman
110	Merriam-Webster’s Collegiate Dictionary, 11th Edition (2003) (“Merriam-Webster”)

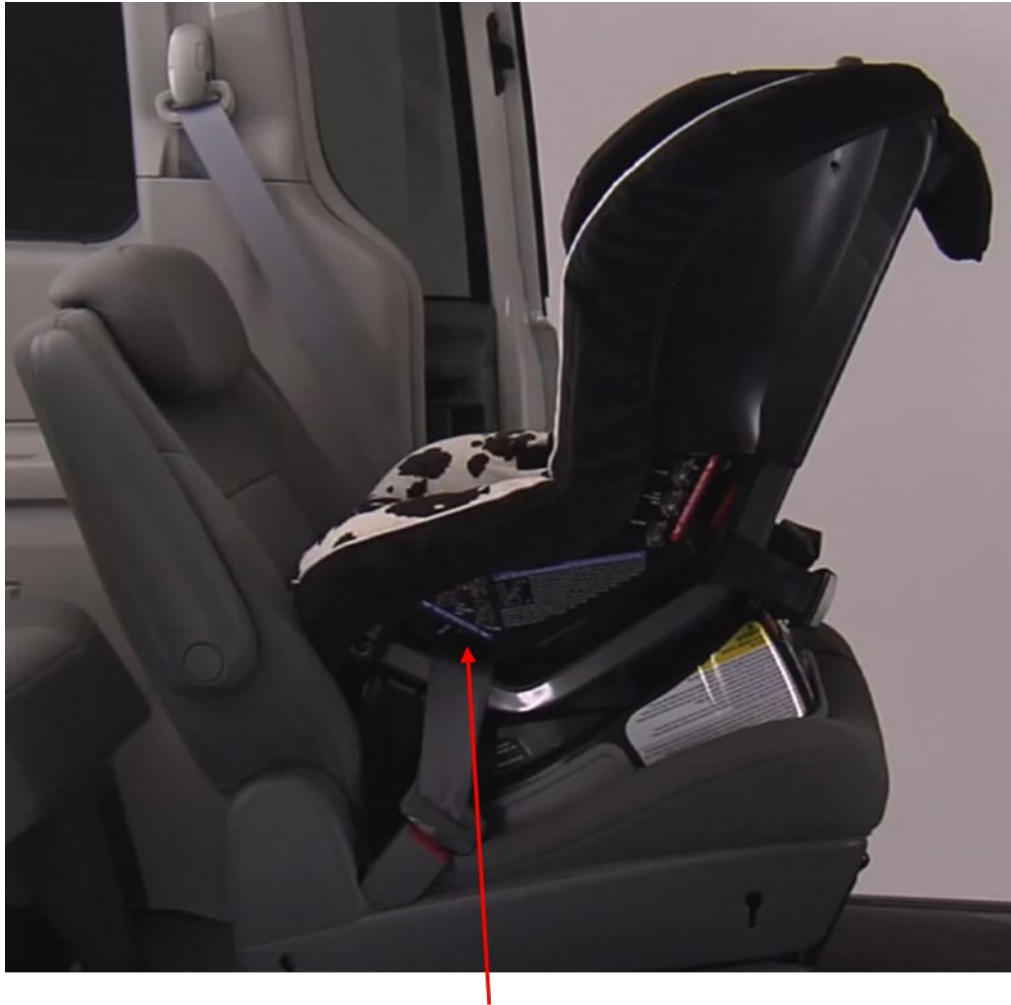
32. This configuration allows *Strong*'s child seat to be securely fastened so as to "securely retain an occupant and limit movement of that occupant, particularly during an impact" and "to reduce the likelihood of injury." *Strong*, ¶ [0002]. *Strong*'s "child safety seat may be configured for installation in a forward-facing position or in a rearward-facing position to accommodate children in the appropriate position based on the height and weight of a child, such as according to the guidelines and standards of the United States National Highway Transportation Safety Administration (NHTSA) and similar authorities in other countries." *Id.*, ¶ [0024].

### **B. Overview of Boulevard 70 CS**

33. The Boulevard 70 CS is a child seat that was sold by Britax Child Safety, Inc., and is a child seat generally similar to that disclosed in *Strong*. *Strong* Tr., 60:24-61:11, 65:24-67:2. The Boulevard 70 CS is further described in the Boulevard 70 CS User Guide ("User Guide") and in four videos produced by Britax and published online by the Britax Child Safety, Inc. YouTube account on January 6, 2011.<sup>2</sup> The Boulevard 70 CS depicted below installed in a rear-facing orientation and in a forward-facing orientation, was a convertible car seat sold by Britax prior to the introduction of Britax's ClickTight products. I understand that the Boulevard 70 CS is prior art under at least pre-AIA 35 U.S.C. § 102(a)(1).

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<sup>2</sup> The four videos are: (1) Britax Child Safety, Inc., video titled "BRITAX Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-offs" (Jan. 6, 2011), available at <https://youtu.be/I1gD5S-9NFE> ("NUNA0005234"); (2) Britax Child Safety, Inc., video titled "BRITAX Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-offs" (Jan. 6, 2011), available at <https://youtu.be/OrL4oZaEwuk> ("NUNA0005232"); (3) Britax Child Safety, Inc., video titled "BRITAX Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and One Lock-off" (Jan. 6, 2011), available at [https://youtu.be/F6V\\_kscSxKE](https://youtu.be/F6V_kscSxKE) ("NUNA0005231"); and (4) Britax Child Safety, Inc., video titled "BRITAX Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and One Lock-off" (Jan. 6, 2011), available at <https://youtu.be/7koBM82iYlw> ("NUNA0005233").



Rear-Facing (First) Belt Path

NUNA0005234 (annotated).



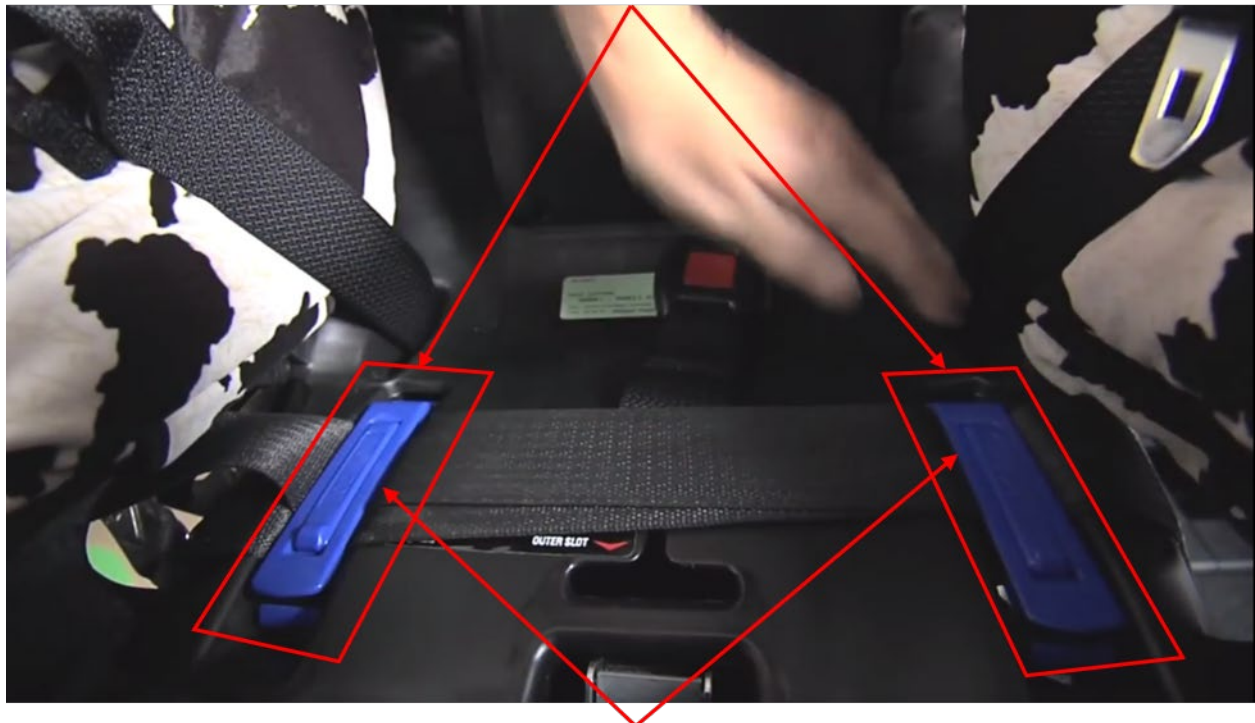
Forward-Facing (Second)  
Belt Path

NUNA0005232 (annotated).

34. The Boulevard 70 CS includes clamps that displace the vehicle belt and add tension to the belt when installing the child seat onto the vehicle seat. User Guide, 14, 23, 29; NUNA0005232; NUNA0005234. The Boulevard 70 CS provides belt pathways for forward and rear-facing directions and two seat-belt lock-offs for each belt pathway. User Guide, 22-23, 28-29; NUNA0005232; NUNA0005234. The rear-facing belt path uses **blue** lock-offs and the front-facing belt path uses **red** lock-offs.



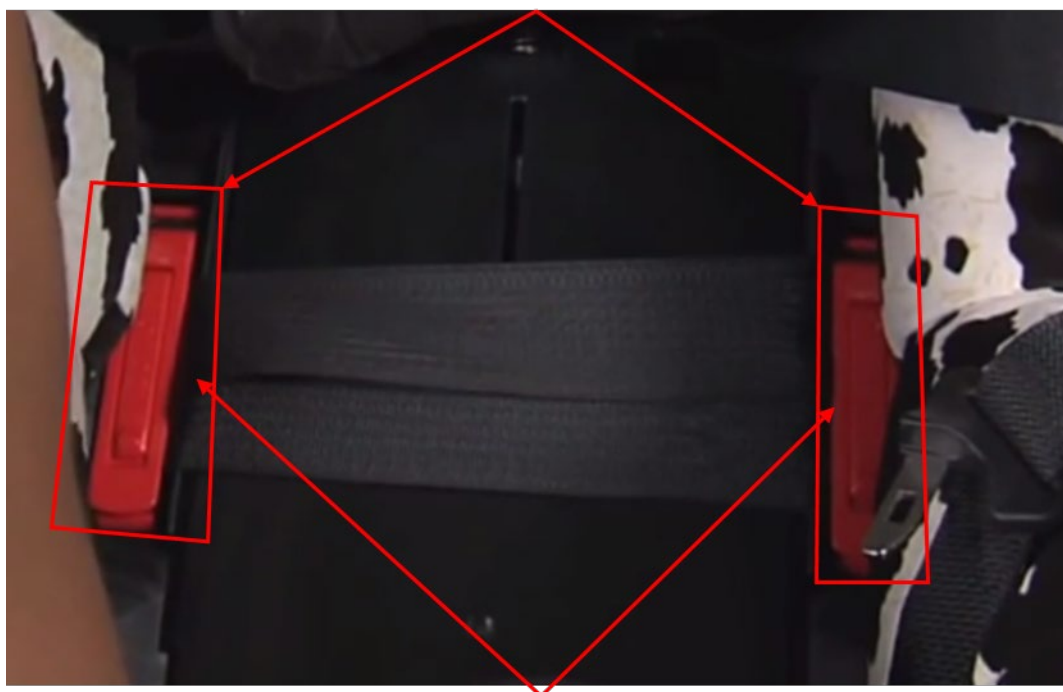
Rear-Facing Lock-Offs



Belt Deflected in  
Recesses of Lock-Offs

NUNA0005234 (annotated).

Forward-Facing Lock-Offs

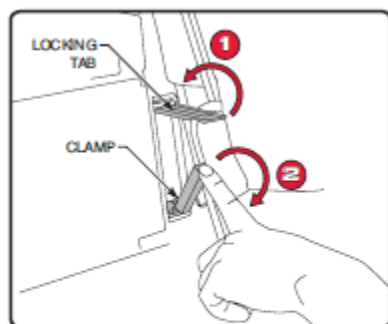


Belt Deflected in  
Recesses of Lock-Offs

NUNA0005232 (annotated).

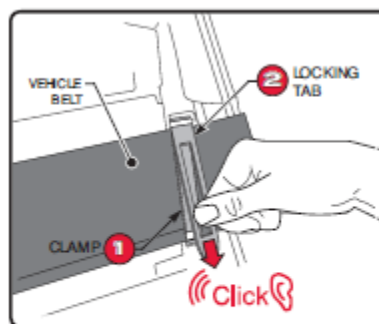
35. The lock-offs of the Boulevard 70 CS have lock-offs that include locking tabs and clamps. User Guide, 14.

To Open:



- 1 Open the locking tab.
- 2 Open the clamp.

To Close:



- 1 Close the clamp over the vehicle belt.
- 2 Slide your palm or thumb along the locking tab until a click is heard.

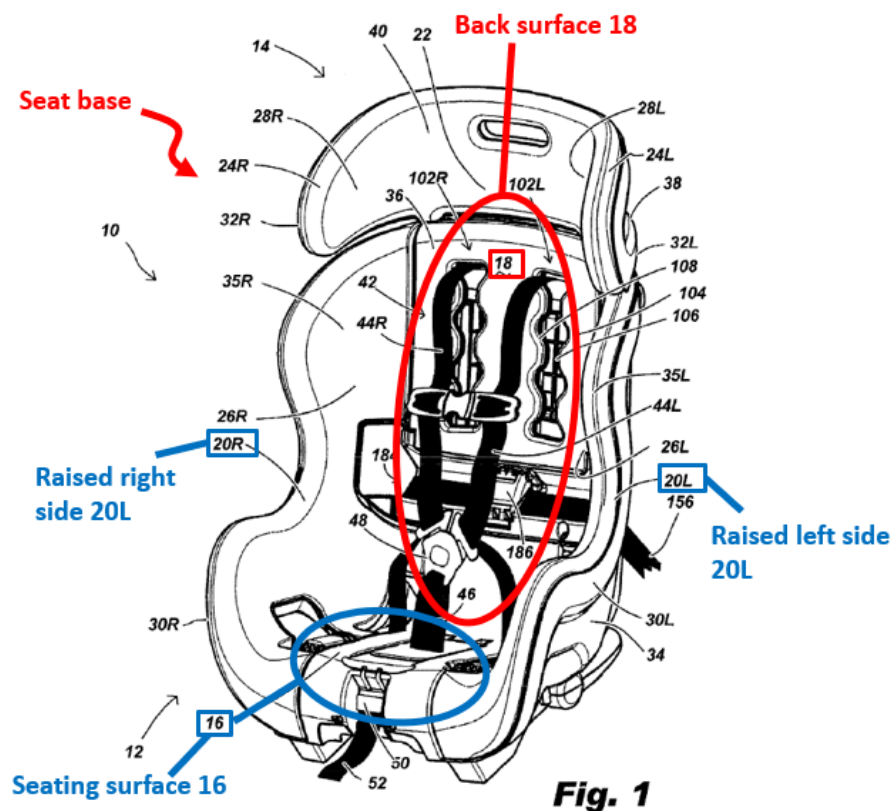
*Id.*

The locking tabs and clamps in the closed position secure the belt to the child seat, displacing the belt into recesses inside the child seat, as shown in the above screenshots from NUNA0005232 and NUNA0005234.

### C. Overview of *Meeker*

36. Like the '074 and '504 patents, U.S. Patent No. 7,901,003 to Meeker et al. ("*Meeker*") discloses a "car seat for transporting a child in an automobile" that is "convertible from a rear-facing infant carrier into a forward-facing toddler carrier." *Meeker*, Abstract. *Meeker* issued on March 8, 2011, and I understand is prior art under at least pre-AIA 35 U.S.C. § 102(a)(1).

37. Seat shell assembly 12 includes a seating surface 16, a back surface 18, and raised right and left sides 20R and 20L. *Id.*, 7:25-27.



*Id.*, Fig. 1 (annotated).

- v. **[16(b)(3)] “wherein placing the tensioning mechanism in the second position allows the seat base to receive the belt, and the movement of the tensioning mechanism from the second position to the first position presses the belt against the first and second edges and deflects a portion of the belt between first and second edges to be closer to the seat or backrest portion than portions of the belt that engage the first and second edges and thus applies tension to the belt to secure the child seat to the vehicle seat in a tensioned configuration,”**

1137. Limitation 16(b)(3) is identical to limitation 1(b)(3). It is my opinion that *Meeker* in view of *Yamazaki* renders obvious limitation 16(b)(3) for the reasons discussed above for limitation 1(b)(3) in Section X.C.2.a.vi.

- vi. **[16(c)] “wherein the seat base of the child seat is configured to receive the belt in both a rear-facing and front-facing orientation.”**

1138. Limitation 16(c) is substantially identical to limitation 1(c), except that limitation 1(c) recites “when the seat base is in both a rear-facing orientation and when the seat base is in a front-facing orientation” and limitation 16(c) recites “in both a rear-facing and front-facing orientation.” It is my opinion that *Meeker* discloses limitation 16(c) for the reasons discussed above for limitation 1(c) in Section X.C.2.a.vii.

## **XI. The Asserted Claims are Invalid Based on the Britax Boulevard 70 CS**

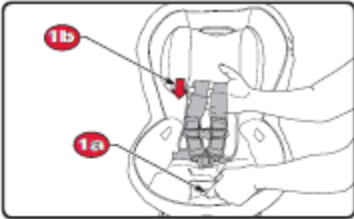
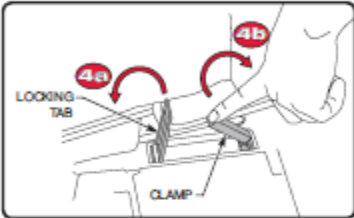


### **A. The Britax Boulevard 70 CS Anticipates Claims 1-15 of the '504 Patent**

#### **1. Independent Claim 1**

- a. **[1(p)] “A child seat configured to be secured to a vehicle seat in both a rear-facing and a forward-facing orientation by a belt of the vehicle seat, the child seat comprising:”**

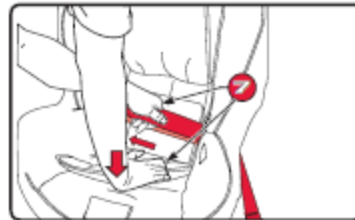
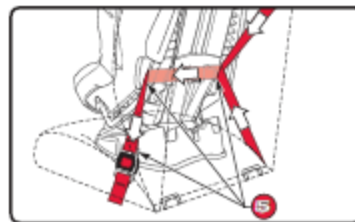
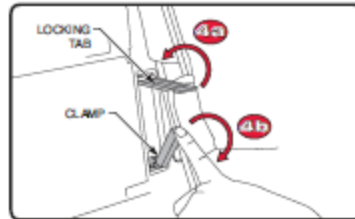
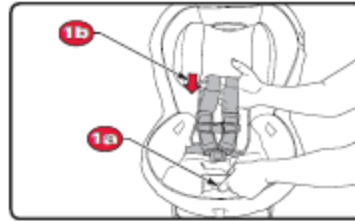
1139. The Boulevard 70 CS discloses a child seat configured to be secured to a vehicle seat in both a rear-facing and a forward-facing orientation by a belt of the vehicle seat.

1140. The User Guide describes the Boulevard 70 CS as a “child seat” repeatedly throughout, *see, generally*, User Guide, and includes sections for “Rear-Facing Installation” and Forward-Facing Installation,” *id.*, 20-31. For example, the User Guide provides instructions on how to install the Boulevard 70 CS using the vehicle’s “lap-shoulder belt” in the rear-facing orientation, *id.*, 22-23, and using the vehicle’s “lap-shoulder belt” in the forward-facing orientation, *id.*, 28-29. These instructions are reproduced below.

- 1** Loosen the harness.
    - a Lift harness adjuster lever
    - b Pull both harness straps forward
  - 2** Remove the body pillow, unbuckle the harness, and remove the belly pad.
  - 3** Pull the head restraint cover up, then pull the seat cover forward while pulling the buckle through to access the rear-facing belt path.
- 
- 
- IMPORTANT:** Ensure the buckle is in inner slot and lying away from the belt path.
- 4** Open the blue lock-off closest to where the vehicle belt will be buckled.
    - a Open the locking tab
    - b Open the clamp
  - 5** Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.
  - 6** Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.
    - a Close the clamp over the vehicle belt
    - b Slide your palm or thumb along the locking tab until a click is heard (see page 14)
- 
- 
- IMPORTANT:** Both the vehicle lap and shoulder belts must be routed through the lock-off.
- 7** Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).
  - 8** Rear-facing installations can be improved by the use of the Versa-Tether (see pages 17 – 19).
  - 9** Pull the buckle up through its appropriate slot in the cover.
  - 10** Replace the cover and the belly pad.

User Guide, 23.

- 1** Loosen the harness.
    - a Lift harness adjuster lever
    - b Pull both harness straps forward
  - 2** Remove the body pillow and unbuckle the harness.
  - 3** Pull the head restraint cover up, then pull the seat cover forward to access the forward-facing belt path.
  - 4** Open the red lock-off closest to where the vehicle belt will be buckled.
    - a Open the locking tab
    - b Open the clamp
  - 5** Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.
  - 6** Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.
    - a Close the clamp over the vehicle belt
    - b Slide your palm or thumb along the locking tab until a click is heard (see page 14)
- IMPORTANT:** Both the vehicle lap and shoulder belts must be routed through the lock-off.
- 7** Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).
  - 8** Attach the Versa-Tether to a designated anchor (see vehicle owner's manual) and remove all slack (see pages 17 – 19).
  - 9** Store the excess webbing in the elastic strap.
  - 10** Replace the cover.



User Guide, 29.

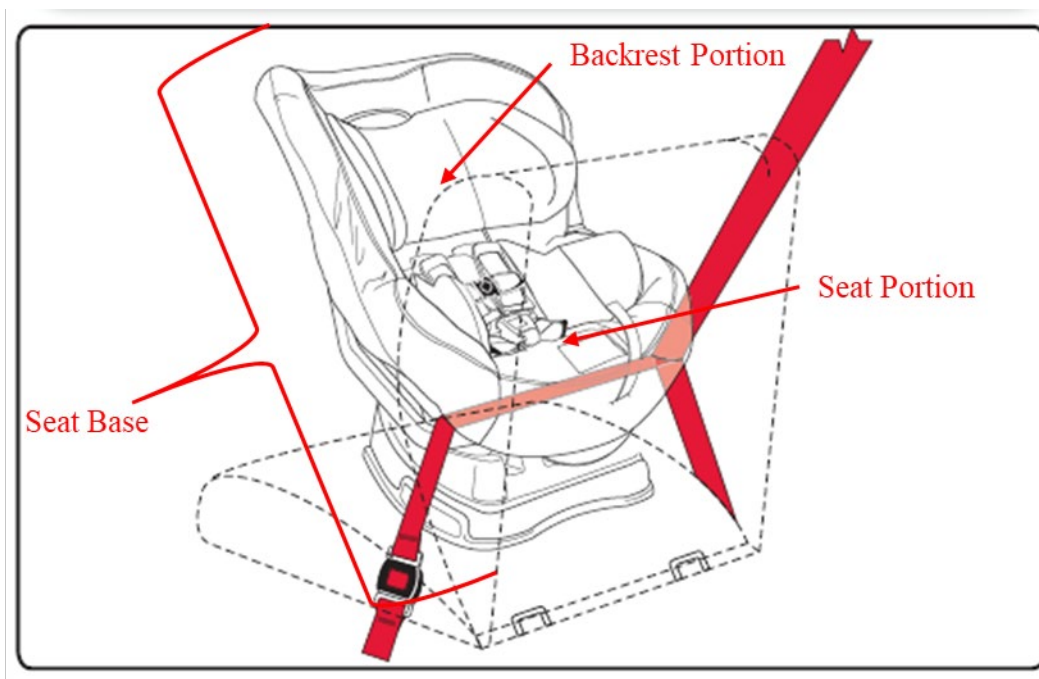
1141. Additionally, the videos provided in NUNA0005233 and NUNA0005234 demonstrate how to secure the Boulevard 70 CS to a vehicle seat in a rear-facing orientation, and the videos provided in NUNA0005231 and NUNA0005232 demonstrate how to secure the Boulevard 70 CS to a vehicle seat in a forward-facing orientation.



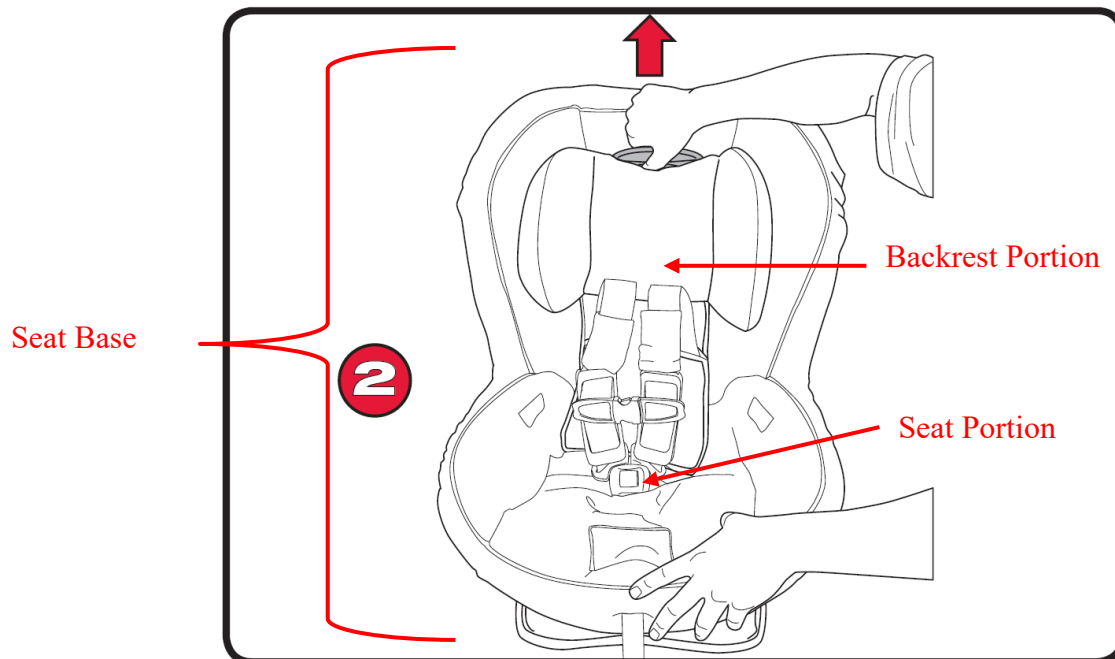
b. [1(a)(1)] “a seat base comprising a seat portion, a backrest portion,”

1142. The Boulevard 70 CS discloses a seat base comprising a seat portion and a backrest portion.

1143. The User Guide depicts the Boulevard 70 as including a seat base comprising a seat portion and a backrest portion. Sample depictions of the Boulevard 70 CS from the User Guide are reproduced below.

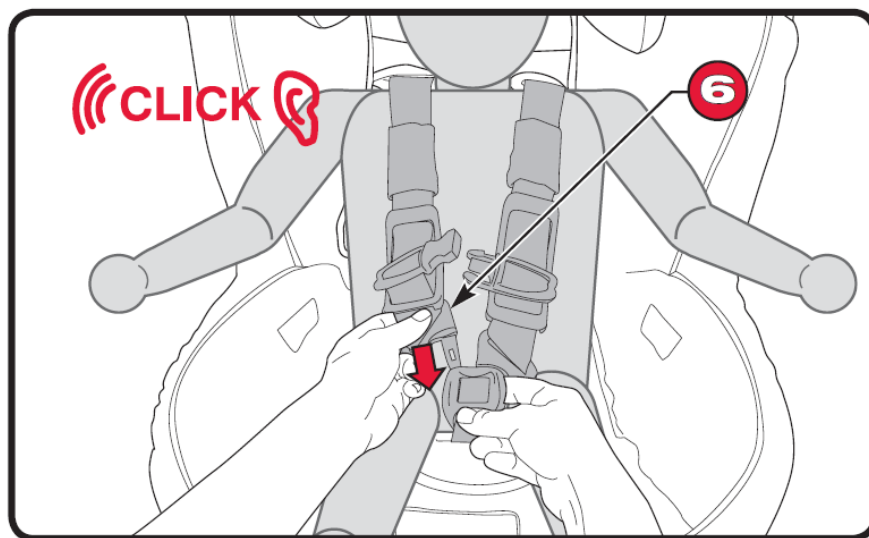


User Guide, 22 (annotated).



*Id.*, 23 (annotated).

1144. The picture from the User Guide, reproduced below, shows that the above-identified backrest portion and seat portion of the Boulevard 70 CS correspond to the backrest and seat areas of the seating area occupied by an occupant.



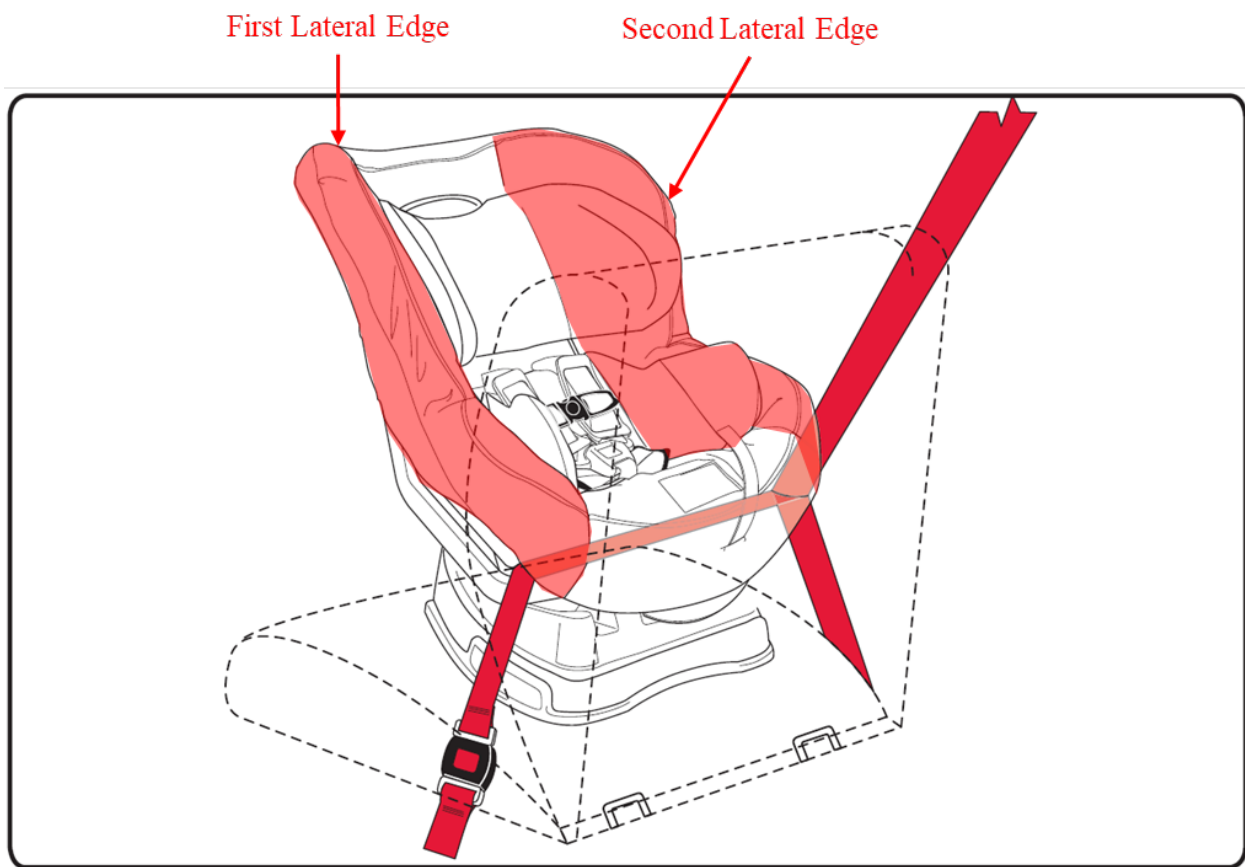
*Id.*, 33.



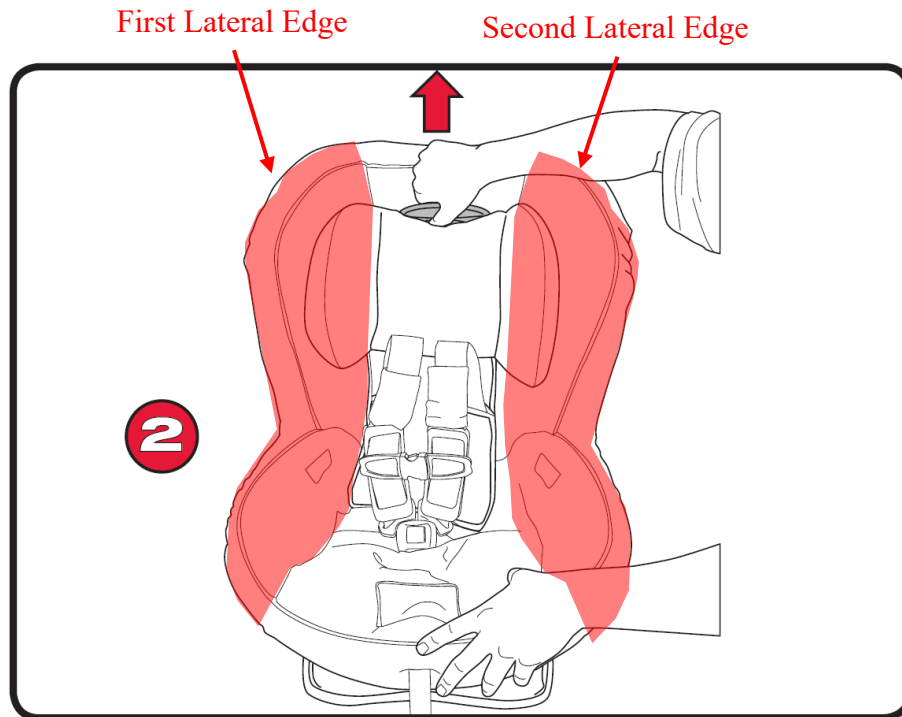
c. **[1(a)(2)] “first and second lateral edges that protrude forwardly and upwardly from the seat and backrest portions,”**

1145. The Boulevard 70 CS discloses first and second lateral edges that protrude forwardly and upwardly from the seat and backrest portions.

1146. The User Guide depicts the Boulevard 70 as including a seat base comprising first and second lateral edges that protrude forwardly and upwardly from the seat and backrest portions. Sample depictions of the Boulevard 70 CS from the User Guide are reproduced below.

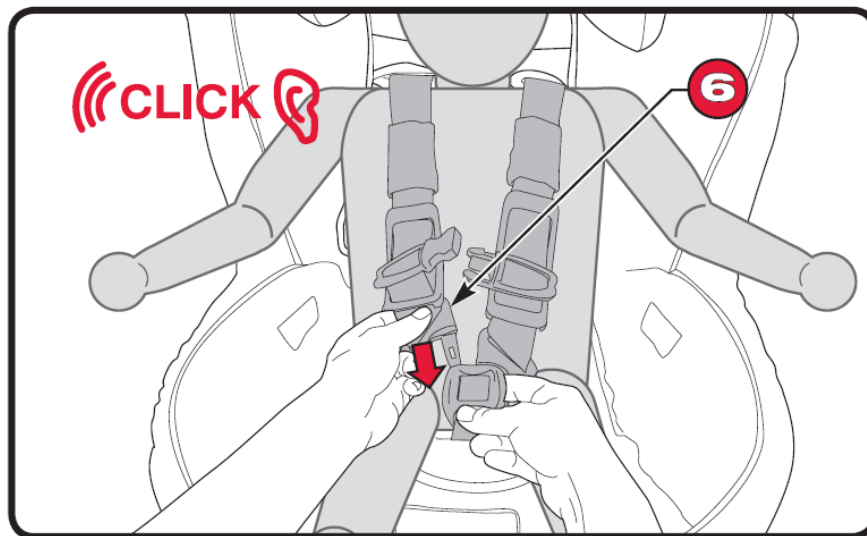


User Guide, 22 (annotated).



*Id.*, 23 (annotated).

1147. The picture from the User Guide, reproduced below, shows that the above-identified first and second lateral edges of the Boulevard 70 CS protrude forwardly and upwardly from the seat and backrest portions.

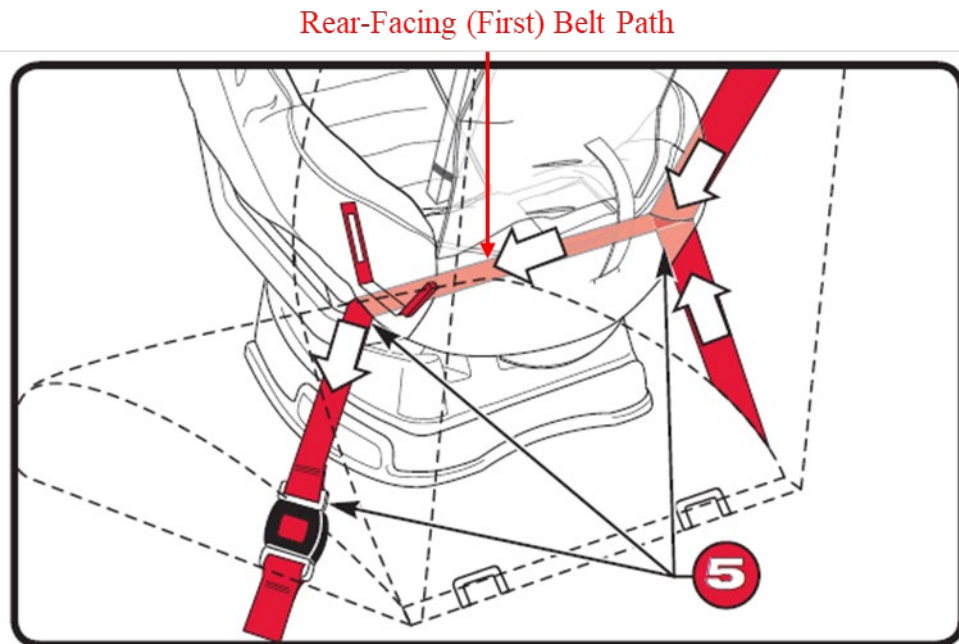


*Id.*, 33.

**d. [1(a)(3)] “a first belt path generally at a middle of the seat portion in a forward and rearward direction, and”**

1148. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 6; *id.*, Exhibit 3 at 7, the Boulevard 70 CS discloses a first belt path generally at a middle of the seat portion in a forward and rearward direction.

1149. The User Guide for the Boulevard 70 CS states instructs the user to “[r]oute the vehicle belt through the rear-facing belt slots, then buckle” for the rear-facing installation. User Guide, 23. This is depicted in the corresponding picture from the User Guide, reproduced below.



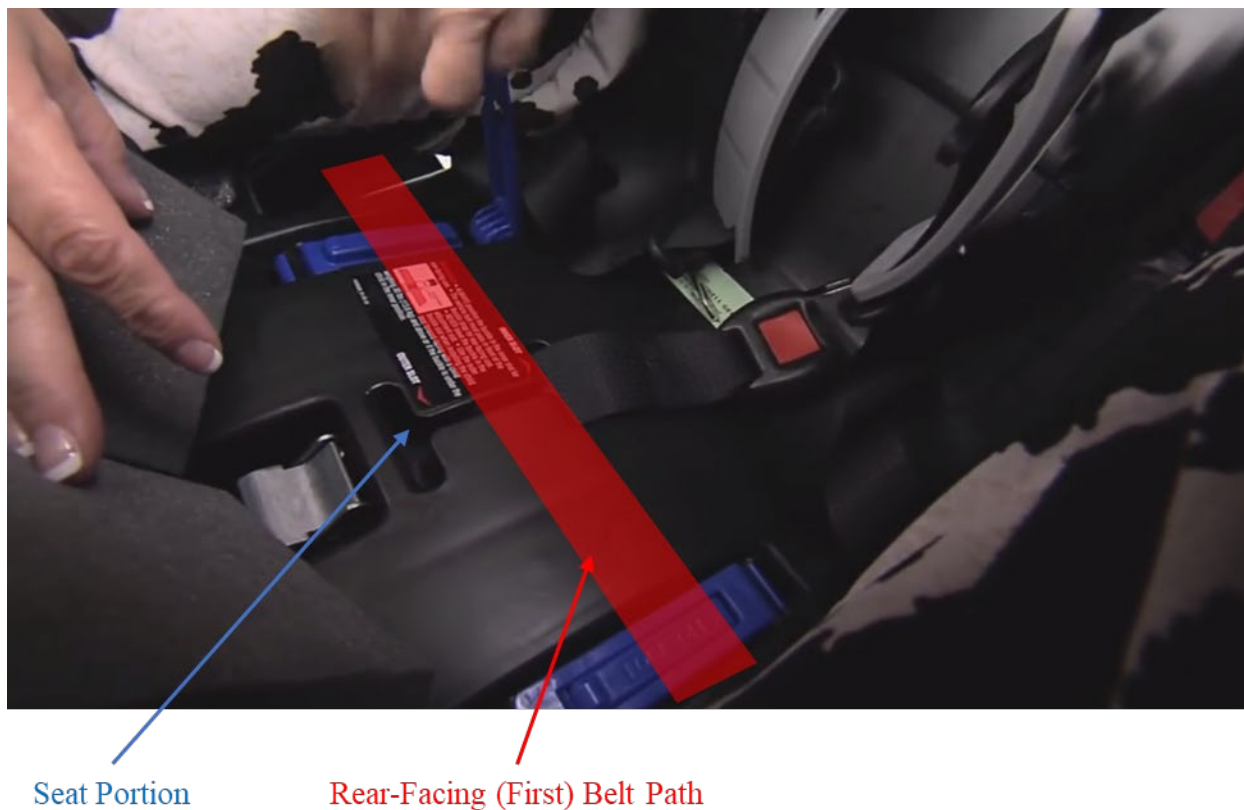
*Id.* (annotated).

1150. NUNA0005234 also instructs the user to “pull the seat portion of the cover forward to access the rear-facing belt path.” NUNA0005234. In addition to the picture from the User Guide shown above, screenshots from this video, reproduced below, show that the rear-facing belt path is generally at a middle of the seat portion in a forward and rearward direction.



Rear-Facing (First) Belt Path

NUNA0005234 (annotated).



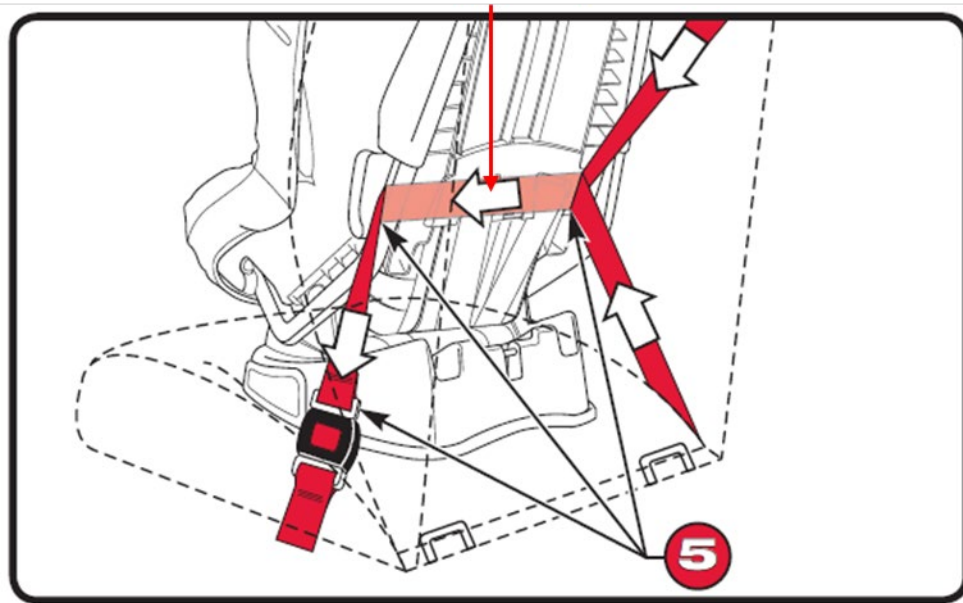
*Id.* (annotated).

- e. **[1(a)(4)] “a second belt path generally at an intersection of the seat and backrest portions; and”**

1151. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 5-6; *id.*, Exhibit 3 at 6-7, the Boulevard 70 CS discloses a second belt path generally at an intersection of the seat and backrest portions.

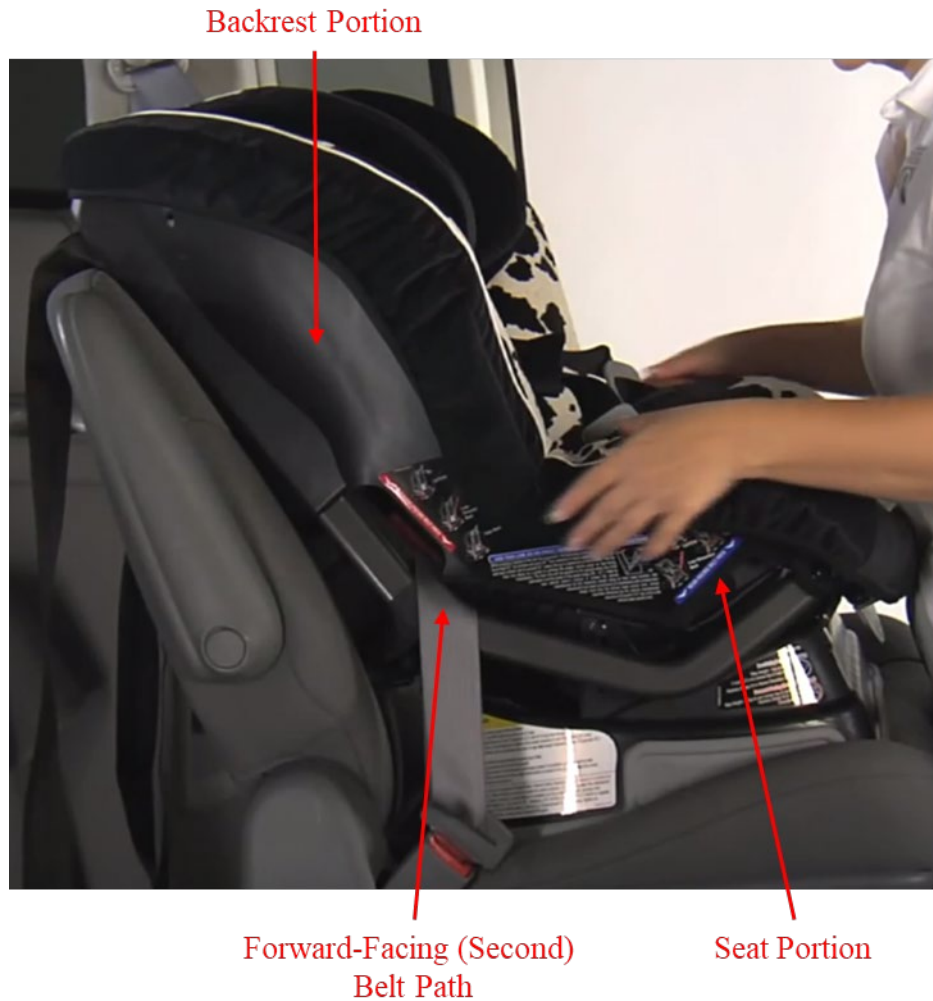
1152. The User Guide for the Boulevard 70 CS instructs users to “[r]oute the vehicle belt through the forward-facing belt slots, then buckle. User Guide, 29. This is depicted in the corresponding picture from the User Guide, reproduced below.

Forward-Facing (Second) Belt Path



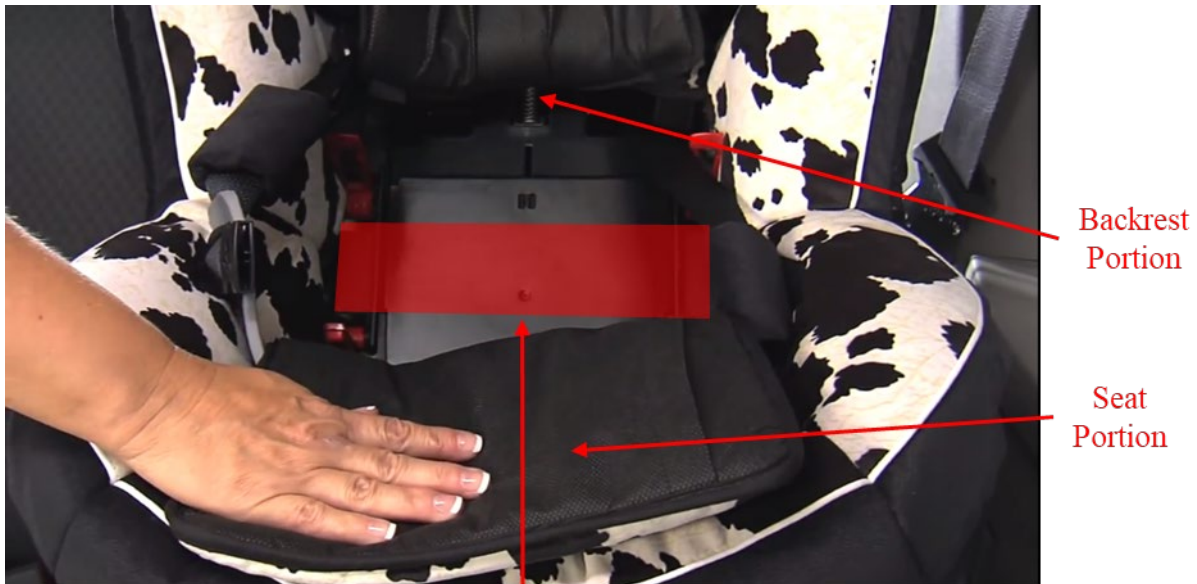
*Id.* (annotated).

1153. NUNA0005232 also instructs the user to “pull the seat portion of the cover forward to access the forward-facing belt path.” NUNA0005234. In addition to the picture from the User Guide shown above, screenshots from this video, reproduced below, show that the forward-facing belt path is generally at an intersection of the seat and backrest portions.



NUNA0005232 (annotated).





Forward-Facing (Second) Belt Path

*Id.* (annotated).

- f. **[1(b)(1)] “a tensioning mechanism attached to the seat base to be movable between a first position and a second position,”**

1154. The Boulevard 70 CS discloses a tensioning mechanism attached to the seat base to be movable between a first position and a second position. This is depicted in the corresponding picture from the User Guide, reproduced below.

1155. As shown below in screenshots from NUNA0005232 and NUNA0005234, the Boulevard 70 CS includes four lock-offs: two for each of the first and second belt paths.

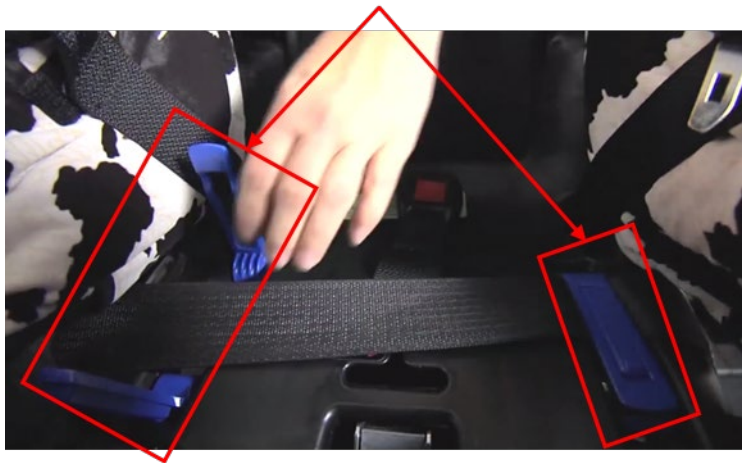


Forward-Facing Lock-Offs



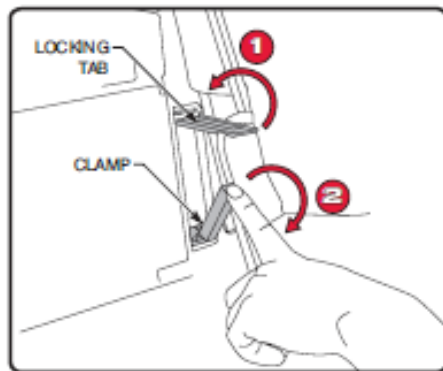
NUNA0005232 (annotated, showing the forward-facing lock-offs, with one open and one closed).

Rear-Facing Lock-Offs

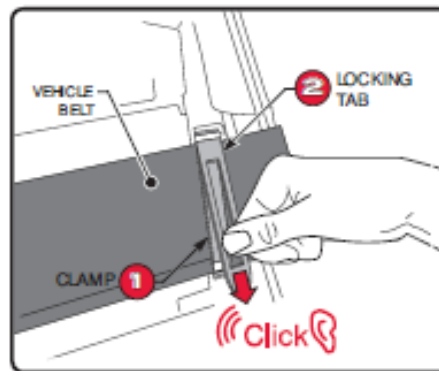


NUNA0005234 (annotated, showing the rear-facing lock-offs, with one open and one closed).

1156. The User Guide for the Boulevard 70 CS provides instructions on how to use the lock-offs. User Guide, 14. It states that “[b]oth parts of the lock-off must be opened to secure a vehicle belt.” *Id.* It also states that the lock-off includes a “locking tab” and a “clamp.” *Id.* The instructions, reproduced below, show that the clamp displaces the belt and the locking tab locks the clamp in place to retain the belt in a tensioned state. *Id.* Based on this disclosure, a POSA would have understood that the clamp of each lock-off is a tensioning mechanism.

**To Open:**

- 1 Open the locking tab.
- 2 Open the clamp.

**To Close:**

- 1 Close the clamp over the vehicle belt.
- 2 Slide your palm or thumb along the locking tab until a click is heard.

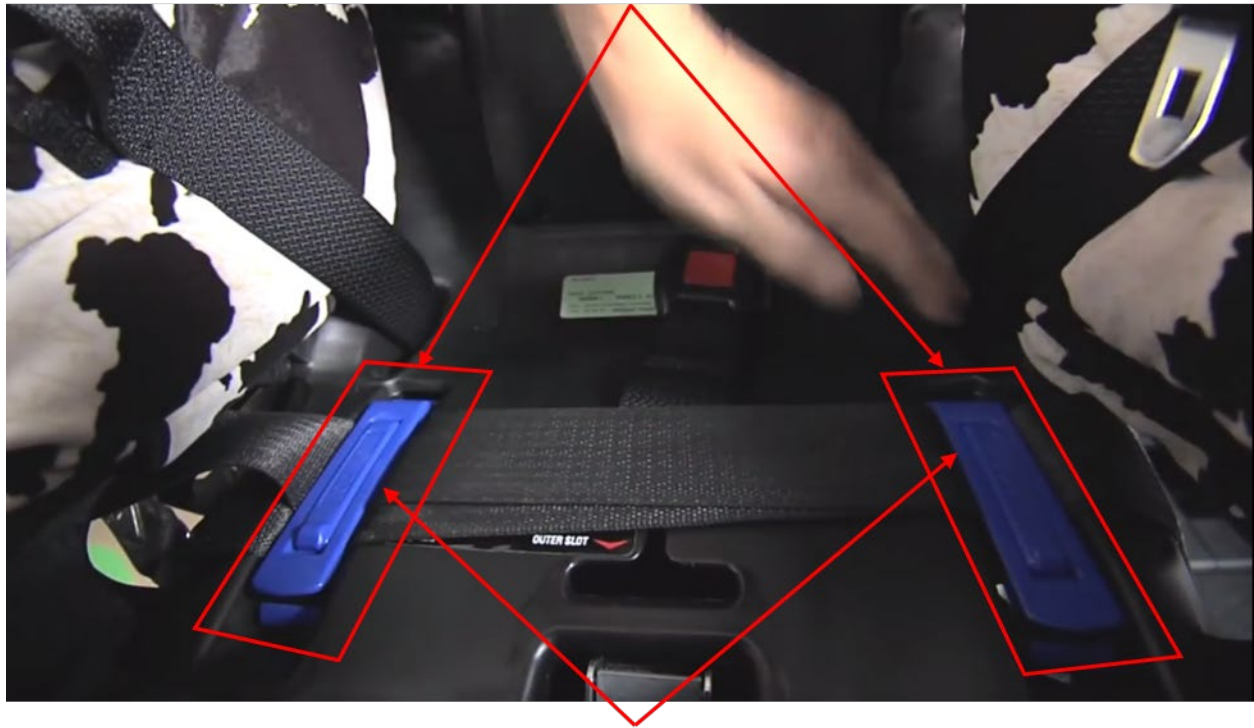
*Id.*

1157. The User Guide provides instructions on the use of the lock-offs for the forward- and rear-facing installation. For both installations, it instructs users to “[o]pen the locking tab” and “open the clamp” off the lock-off. *Id.* 23, 29. In this position, the clamp is in the second position. After routing the lap and shoulder portions of the belt through the belt slots and “[p]ush[ing] down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt,” it instructs users to “lock the lock-off” by “[c]los[ing] the clamp over the vehicle belt” and “[s]lid[ing] your palm or thumb along the locking tab until a click is heard.” *Id.* In this position, the clamp is in the first position. These instructions are consistent with what is conveyed in NUNA005232 and NUNA0005234, except the User Guide instructs users to only use one of the lock-offs in each belt path, and NUNA005232 and NUNA0005234 instruct users to use both. *See* NUNA005232 and NUNA0005234.

1158. As can be seen in NUNA0005234, the clamp of each lock-off deflects the belt within a recess in the seat base, thereby adding tension to the belt. The clamp portion of each

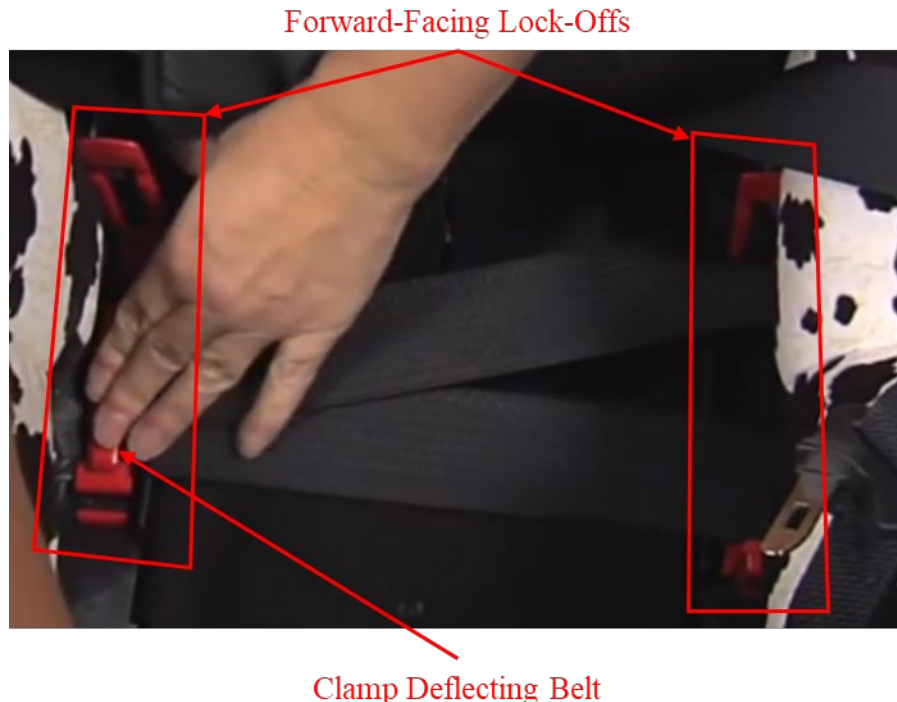
lock-off is what provides the deflection, as stated in the User Guide, which instructs users to “[c]lose the clamp over the vehicle belt,” and seen in NUNA0005232 and NUNA0005234.

Rear-Facing Lock-Offs



Belt Deflected in  
Recesses of Lock-Offs

NUNA0005234 (annotated).



NUNA0005232 (annotated, showing belt deflection caused by the clamp of a lock-off).

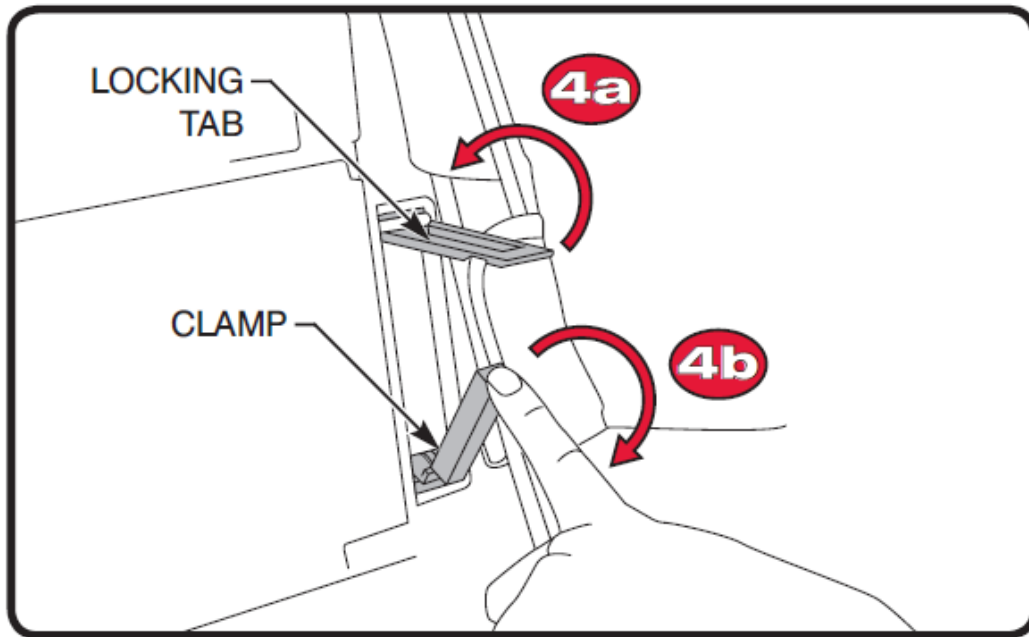
1159. Based on Britax’s infringement contentions and these disclosures, a POSA would have understood that the clamps of each lock-off are a tensioning mechanism attached to the seat base to be movable between a first position and a second position.

- g. **[1(b)(2)] “the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism rotates between the first position and the second position pivotally about the axis, and”**

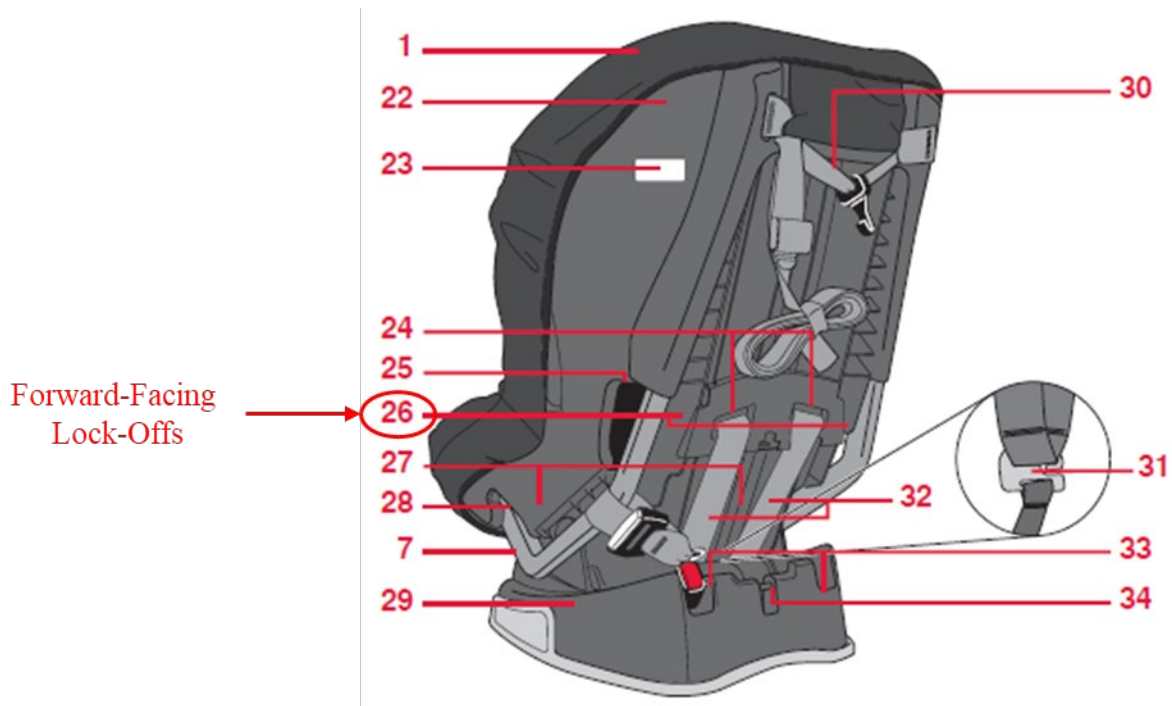
1160. The Boulevard 70 CS discloses the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism rotates between the first position and the second position pivotally about the axis.

1161. As stated above in Section XI.A.1.f, the clamps of each lock-off in the Boulevard 70 CS are a tensioning mechanism attached to the seat base to be movable between a first position and a second position. A POSA would have understood that the forward-facing (red) clamps have an end attached to the backrest portion at an axis such that they rotate between the

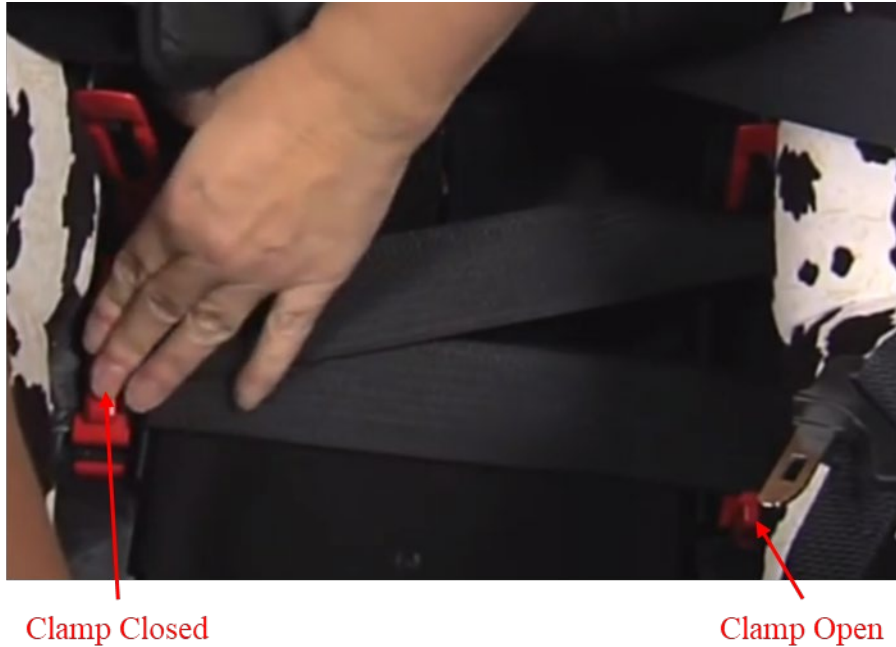
first position and the second position pivotally about the axis. For example, the User Guide and NUNA0005232 both depict the clamp of the lock-offs for the forward-facing belt path attached to the backrest at an end such that they rotate between open and closed positions about an axis.



User Guide, 29 (red arrows depicting rotation).



*Id.* 11 (annotated, indicating that numeral 26 corresponds to “Forward-Facing Lock-Offs (Red - under cover on front of shell)”)



NUNA0005232 (annotated).

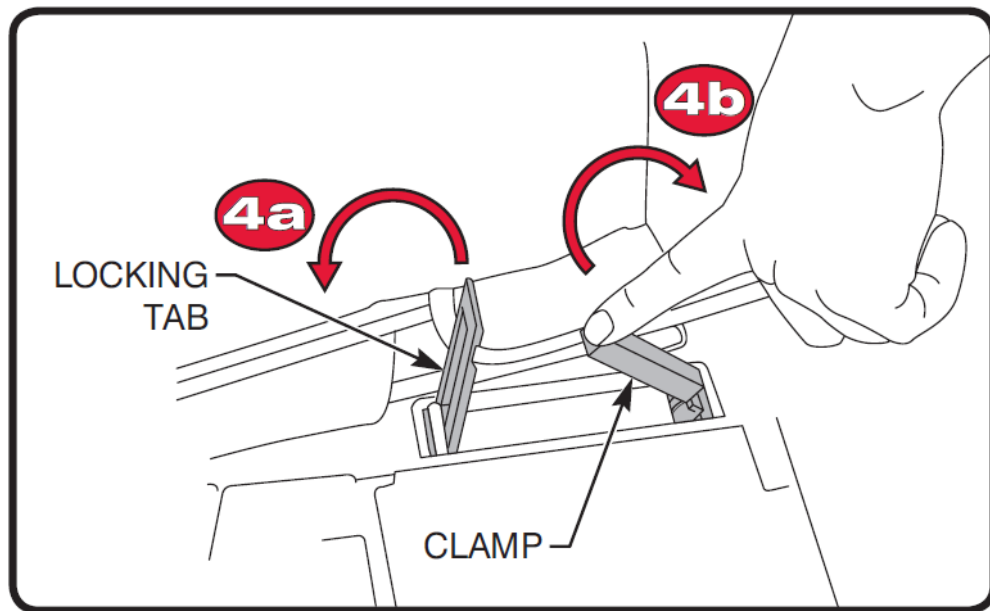
- h. [1(b)(3)] “wherein the tensioning mechanism has a first lateral edge surface and a second lateral edge surface, the first and second lateral edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis,”**

1162. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 10; *id.*, Exhibit 3 at 11, the Boulevard 70 CS discloses that wherein the tensioning mechanism has a first lateral edge surface and a second lateral edge surface, the first and second lateral edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis.

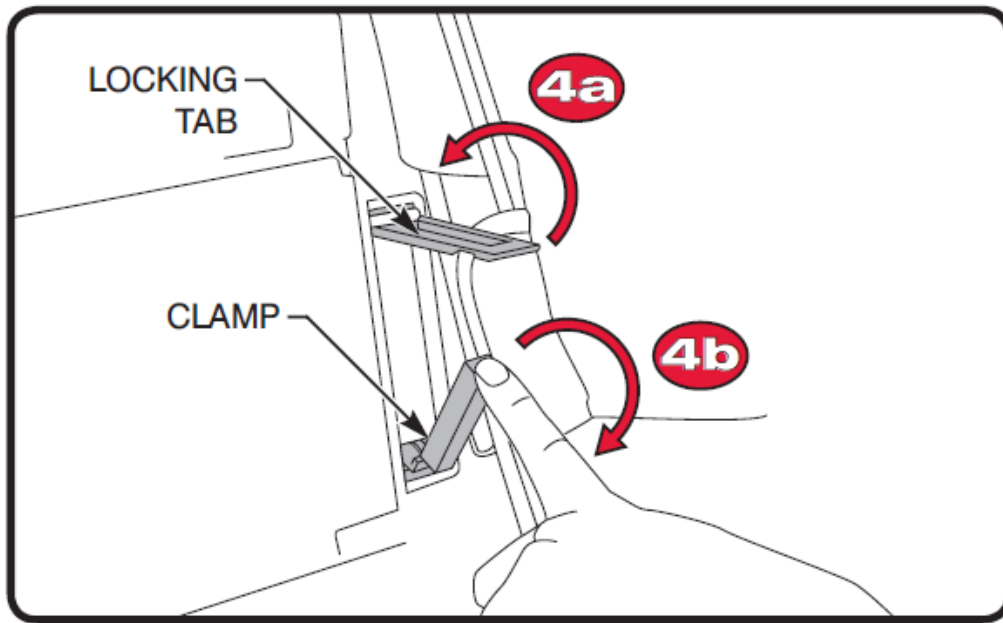
1163. As stated above in Section XI.A.1.f, the clamps of each lock-off in the Boulevard 70 CS are a tensioning mechanism attached to the seat base to be movable between a first position and a second position. The clamps include a first lateral edge surface and a second lateral edge surface. For example, each of the bottom, left, and right surfaces of each clamp is



located on a lateral edge of the tensioning mechanism formed by the clamps of the four lock-offs and extends along respective sides of the tensioning mechanism. Based on Britax's infringement contentions, the bottom, left, or right surfaces of the clamps on one side of the child seat are a first lateral edge surface, and the bottom, left, or right surfaces of the clamps on the other side of the child seat are a second lateral edge surface. The User Guide shows that each of these surfaces extend along respective sides of the tensioning mechanism from and transverse to the axis about which each clamp rotates.



User Guide, 23.



*Id.*, 29.

1164. In Britax's infringement contentions, it identifies portions of both True Tension doors in the Accused Products as including the first and second lateral edge surfaces, even though the True Tension door corresponding to the rear-facing orientation is not attached to the backrest portion at the same "axis" as the True Tension door corresponding to the front-facing orientation. Britax's Supplemental Infringement Contentions, Exhibit 1 at 10; *id.*, Exhibit 3 at 11. Based on my understanding of how Britax has apparently interpreted this term in its infringement contentions, the clamps on one side of the child seat, i.e., one red clamp and one blue clamp on the same side, include a first lateral edge surface that extends along one side of the tensioning mechanism from and transverse to the axis, and the clamps on the other side of the child seat, i.e., one red clamp and one blue clamp on the opposite side, include a second lateral edge surface that extends along the other side of the tensioning mechanism from and transverse to the axis, although each pair of red and blue clamps are located on different axes similarly to the True Tension doors of the accused products.

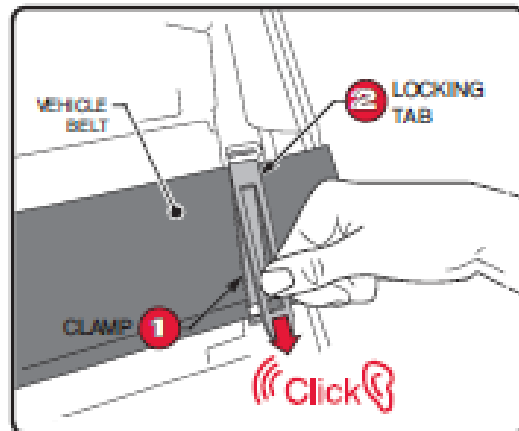


i. **[1(b)(4)] “wherein in the first position, the tensioning mechanism is substantially adjacent to the seat base, and”**

1165. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 11; *id.*, Exhibit 3 at 12, the Boulevard 70 CS discloses that in the first position, the tensioning mechanism is substantially adjacent to the seat base.

1166. As stated above in Section XI.A.1.f, the clamps of each lock-off in the Boulevard 70 CS are a tensioning mechanism attached to the seat base to be movable between a first position and a second position. The User Guide shows that when each clamp is closed, i.e., in the first position, it is substantially adjacent to the seat base.

**To Close:**



- 1 Close the clamp over the vehicle belt.
- 2 Slide your palm or thumb along the locking tab until a click is heard.

User Guide, 14.

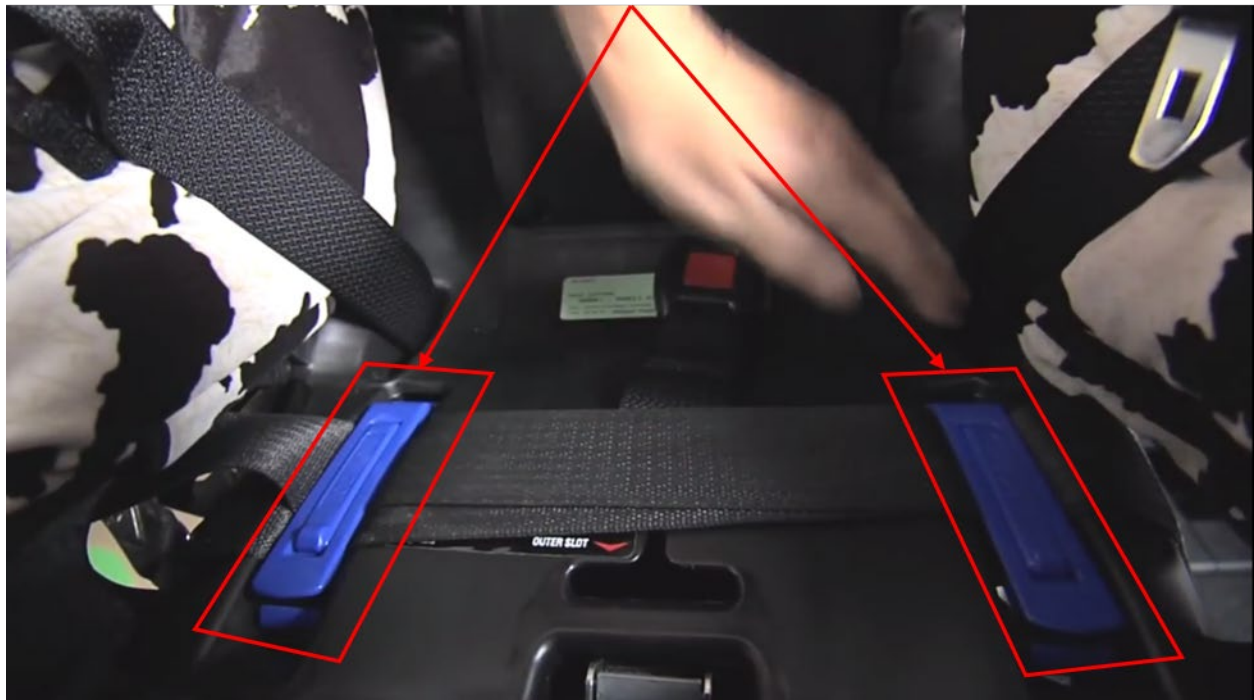
1167. This can also be seen in NUNA0005232 and NUNA0005234, screenshots of which are shown below.

Forward-Facing Lock-Offs



NUNA0005232 (annotated).

Rear-Facing Lock-Offs

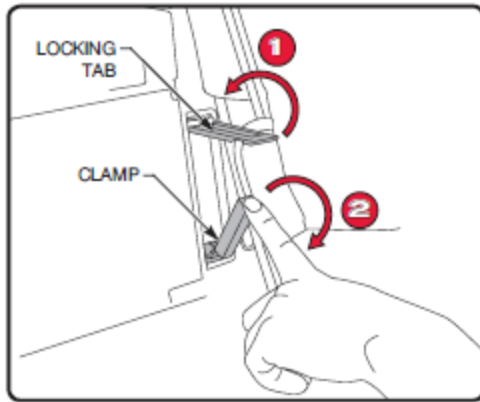


NUNA0005234 (annotated).

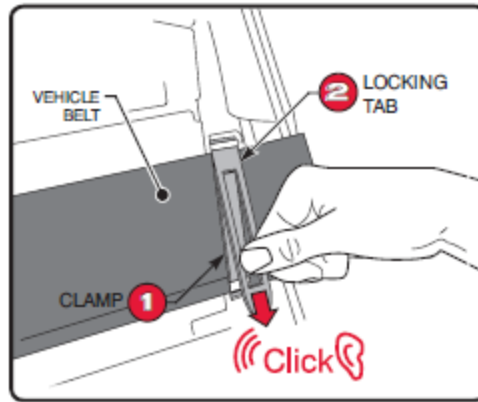
- j. **[1(b)(5)] “wherein in the second position, the tensioning mechanism is at least partly displaced from the seat base in order to enable at least one of the first belt path or the second belt path to receive the belt;”**

1168. The Boulevard 70 CS discloses that in the second position, the tensioning mechanism is at least partly displaced from the seat base in order to enable at least one of the first belt path or the second belt path to receive the belt.

1169. As stated above in Section XI.A.1.f, the clamps of each lock-off in the Boulevard 70 CS are a tensioning mechanism attached to the seat base to be movable between a first position and a second position. The User Guide shows that when each clamp is opened, i.e., in the second position, it is at least partly displaced from the seat base in order to enable at least one of the first belt path or the second belt path to receive the belt. For example, the instructions for using the lock-offs in the User Guide state that “[b]oth parts of the lock-off must be opened to secure a vehicle belt.” User Guide, 14. This can also be seen in the corresponding figure, reproduced below. The instructions for rear-facing and forward-facing installation also both instruct the user to open the clamp before routing the belt through the belt slots. *Id.*, 23, 29.

**To Open:**

- 1 Open the locking tab.
- 2 Open the clamp.

**To Close:**

- 1 Close the clamp over the vehicle belt.
- 2 Slide your palm or thumb along the locking tab until a click is heard.

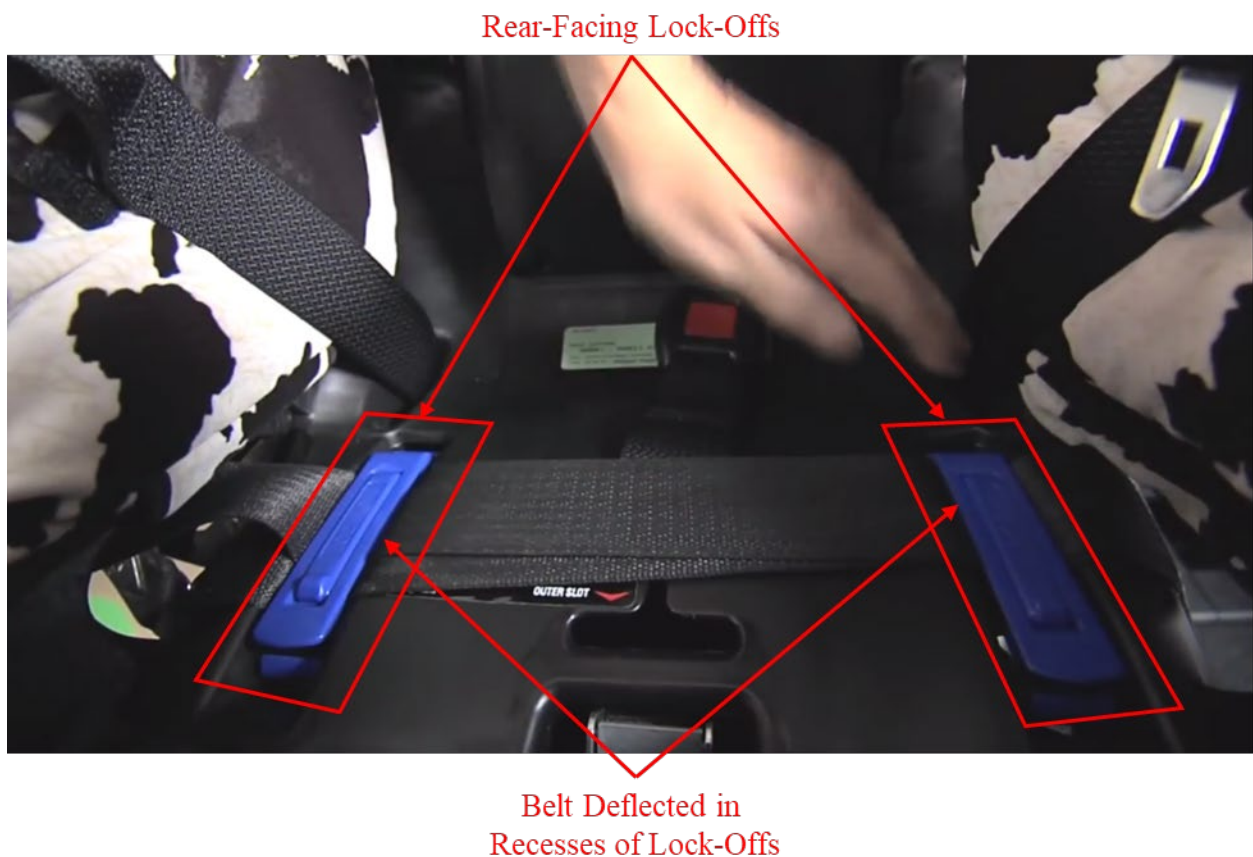
*Id.*, 14.

1170. This is consistent with what is depicted in NUNA0005232 and NUNA0005234, which instruct the user to “open both blue lock-offs by opening the locking tab and then opening the clamp,” NUNA0005234, and “open both red lock-offs by opening the locking tab and then opening the clamp,” NUNA0005232,, before routing the belt through the respective belt paths.

- k. **[1(c)(1)] “wherein the first belt path is configured to allow a user to position the belt to be displaced by the first and second lateral edge surfaces relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation,”**

1171. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 13; *id.*, Exhibit 3 at 14, the Boulevard 70 CS discloses that the first belt path is configured to allow a user to position the belt to be displaced by the first and second lateral edge surfaces relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation.

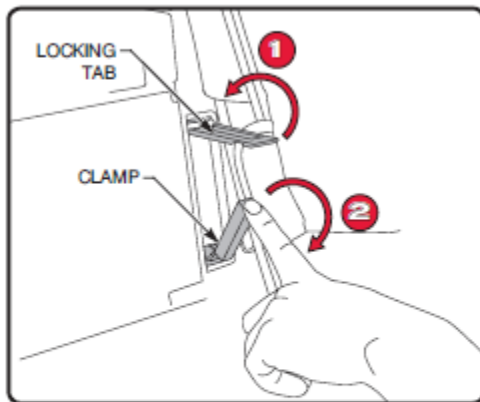
1172. As stated above in Section XI.A.1.h, the Boulevard 70 CS includes first and second lateral edge surfaces. The blue lock-offs in the Boulevard 70 CS correspond to the first belt path, as shown above in Section XI.A.1.d. NUNA0005234, which instructs users how to install the Boulevard 70 CS in a rear-facing orientation, shows that when the belt is routed through the rear-facing belt path and the blue clamps, each of which include portions of the first and second lateral edge surfaces, are closed the belt positioned in the rear-facing belt path is displaced by the bottom, left, and right surfaces of the clamps relative to the first and second lateral edges to secure the child seat to the vehicle seat. This is shown in the screenshot of NUNA0005234 reproduced below.



NUNA0005234 (annotated).

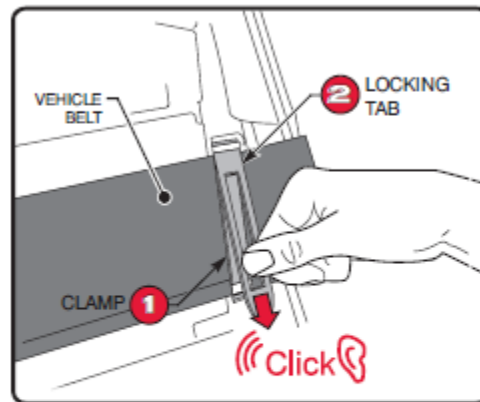
1173. This is also shown in the rear-facing installation instructions and the lock-off instructions found in the User Guide. For example, the User Guide instructs users to “[c]lose the clamp over the vehicle belt,” the picture of which, reproduced below, shows that doing so displaces the belt. User Guide, 14. A portion of the rear-facing installation instructions depicting this limitation is also shown below.

**To Open:**



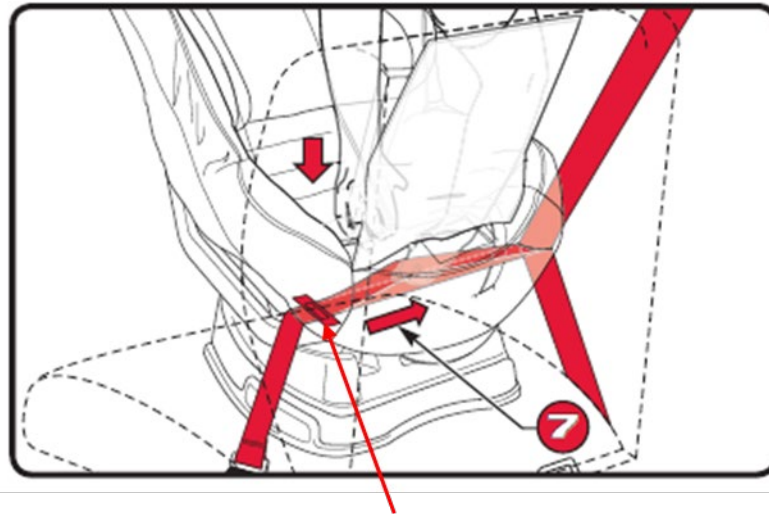
- 1 Open the locking tab.
- 2 Open the clamp.

**To Close:**



- 1 Close the clamp over the vehicle belt.
- 2 Slide your palm or thumb along the locking tab until a click is heard.

*Id.*, 14.



Rear-Facing Lock-Off

*Id.*, 23 (annotated).

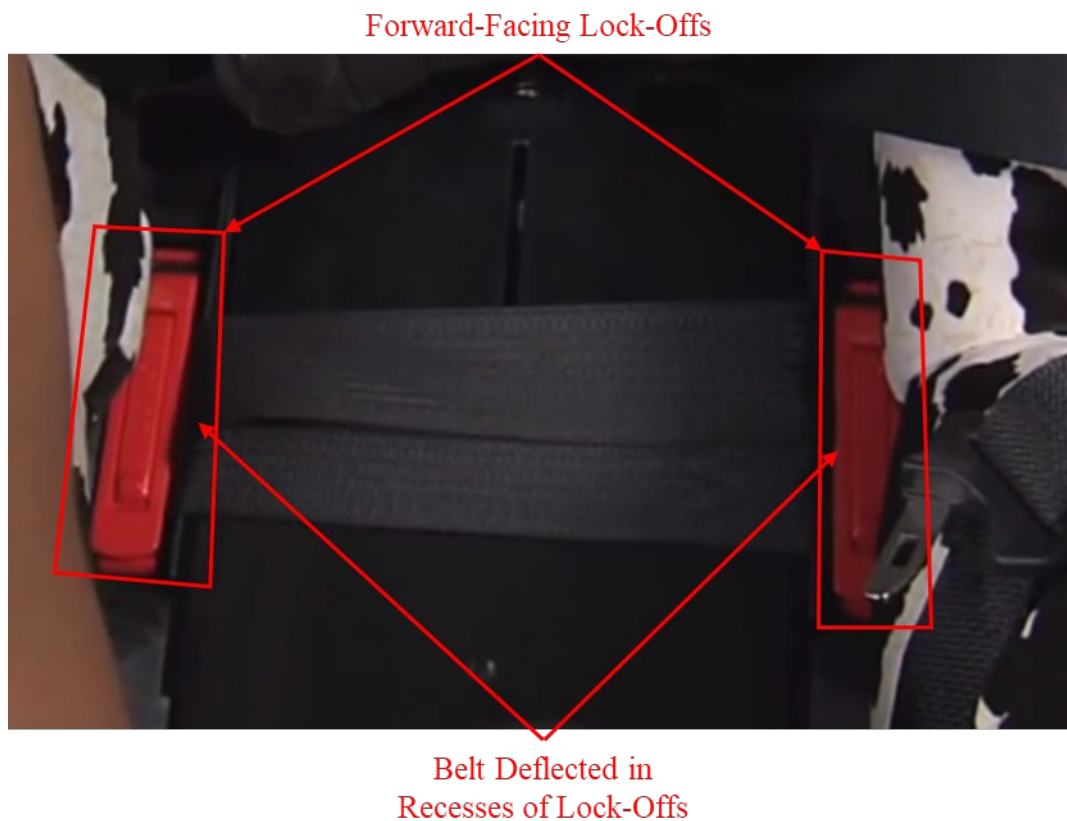
- I. **[1(c)(2)] “wherein the second belt path is configured to allow the user to position the belt to be displaced by the first and second lateral edge surfaces relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation, and”**

1174. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 15; *id.*, Exhibit 3 at 16, the Boulevard 70 CS discloses that the second belt path is configured to allow the user to position the belt to be displaced by the first and second lateral edge surfaces relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.

1175. As stated above in Section XI.A.1.h, the Boulevard 70 CS includes first and second lateral edge surfaces. The red lock-offs in the Boulevard 70 CS correspond to the second belt path, as shown above in Section XI.A.1.e. NUNA0005232, which instructs users how to install the Boulevard 70 CS in a forward-facing orientation, shows that when the belt is routed through the forward-facing belt path and the red clamps, each of which include portions of the



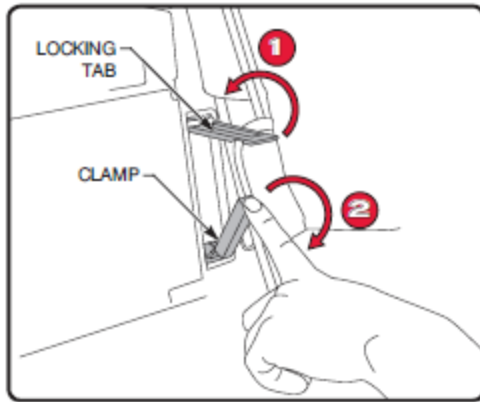
first and second lateral edge surfaces, are closed the belt positioned in the rear-facing belt path is displaced by the bottom, left, and right surfaces of the clamps relative to the first and second lateral edges to secure the child seat to the vehicle seat. This is shown in the screenshot of NUNA0005232 reproduced below.



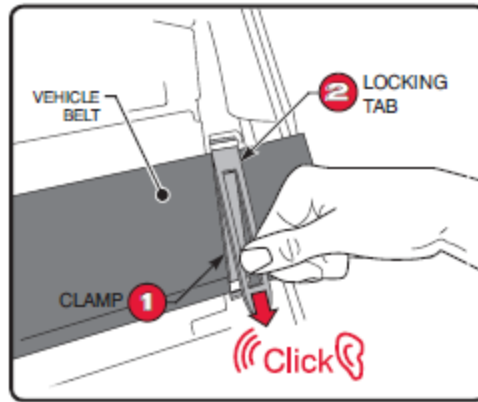
NUNA0005232 (annotated).

1176. This is also shown in the lock-off instructions found in the User Guide. For example, the User Guide instructs users to “[c]lose the clamp over the vehicle belt,” the picture of which, reproduced below, shows that doing so displaces the belt. User Guide, 14.



**To Open:**

- 1 Open the locking tab.
- 2 Open the clamp.

**To Close:**

- 1 Close the clamp over the vehicle belt.
- 2 Slide your palm or thumb along the locking tab until a click is heard.

*Id.*, 14.

- m. **[1(d)] “wherein in each of the forward or rear-facing orientations, the first and second lateral edge surfaces of respective different portions of the tensioning mechanism displace the belt to apply tension to the belt.”**

1177. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 17; *id.*, Exhibit 3 at 18, the Boulevard 70 CS discloses that in each of the forward or rear-facing orientations, the first and second lateral edge surfaces of respective different portions of the tensioning mechanism displace the belt to apply tension to the belt.

1178. As discussed above in Section XI.A.1.k with respect to limitation 1(c)(1), the first and second lateral edge surfaces of the blue clamps displace the belt to apply tension to the belt when the seat is installed in the rear-facing orientation. As discussed above in Section XI.A.1.l with respect to limitation 1(c)(2), the first and second lateral edge surfaces of the red clamps displace the belt to apply tension to the belt when the seat is installed in the forward-facing

orientation. Based on how Britax has apparently interpreted this limitation in its infringement contentions, the first and second lateral edge surfaces of respective different portions of the tensioning mechanism displace the belt to apply tension to the belt.

## 2. Independent Claim 5

- a. **[5(p)] “A child seat configured to be secured to a vehicle seat in a rear-facing orientation in which an occupant of the child seat faces toward a backrest of the vehicle seat and a forward-facing orientation in which an occupant of the child seat faces away from the vehicle backrest, where the vehicle seat has a vehicle belt having a lap portion and a shoulder portion, the child seat comprising:”**

1179. Limitation 5(p) is substantially identical to limitation 1(p), except that limitation 5(p) includes an explanation of the rear-facing and forward-facing orientations and recites “where the vehicle seat has a vehicle belt having a lap portion and a shoulder portion.” For the reasons stated above in Section XI.A.1.a, the Boulevard 70 CS discloses this limitation.

- b. **[5(a)(1)] “a seat base comprising a seat portion and a backrest portion, and”**

1180. Limitation 5(a)(1) is identical to limitation 1(a)(1). It is my opinion that the Boulevard 70 CS discloses limitation 5(a)(1) for the reasons discussed above for limitation 1(a)(1) in Section XI.A.1.b.

- c. **[5(a)(2)] “first and second lateral edges that protrude forwardly and upwardly from the seat and backrest portions;”**

1181. Limitation 5(a)(2) is identical to limitation 1(a)(2). It is my opinion that the Boulevard 70 CS discloses limitation 5(a)(2) for the reasons discussed above for limitation 1(a)(2) in Section XI.A.1.c.

**d. [5(b)(1)] “a first belt path generally at a middle of the seat portion in a forward and rearward direction, and”**

1182. Limitation 5(b)(1) is identical to limitation 1(a)(3). In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 26; *id.*, Exhibit 3 at 28-29, it is my opinion that the Boulevard 70 CS discloses limitation 5(b)(1) for the reasons discussed above for limitation 1(a)(3) in Section XI.A.1.d.

**e. [5(b)(2)] “a second belt path generally at an intersection of the seat and backrest portions; and”**

1183. Limitation 5(b)(2) is identical to limitation 1(a)(4). In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 27; *id.*, Exhibit 3 at 30, it is my opinion that the Boulevard 70 CS discloses limitation 5(b)(2) for the reasons discussed above for limitation 1(a)(4) in Section XI.A.1.e.

**f. [5(c)(1)] “a tensioning mechanism attached to the seat base to be movable between a first position and a second position,”**

1184. Limitation 5(c)(1) is identical to limitation 1(b)(1). It is my opinion that the Boulevard 70 CS discloses limitation 5(c)(1) for the reasons discussed above for limitation 1(b)(1) in Section XI.A.1.f.

**g. [5(c)(2)] “the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism is rotatable between the first position and the second position pivotally about the axis, and”**

1185. Limitation 5(c)(2) is substantially identical to limitation 1(b)(2), except that limitation 1(b)(2) states that the tensioning mechanism “rotates” and limitation 5(c)(2) states that the tensioning mechanism “is rotatable.” It is my opinion that the Boulevard 70 CS discloses limitation 5(c)(2) for the reasons discussed above for limitation 1(b)(2) in Section XI.A.1.g.

**h. [5(c)(3)] “wherein the tensioning mechanism has a first rigid edge surface and a second rigid edge surface,”**

1186. Limitation 5(c)(3) is substantially identical to the first portion of limitation 1(b)(3), except that limitation 1(b)(3) states that the tensioning mechanism has first and second “lateral” edge surfaces and limitation 5(c)(3) states that the tensioning mechanism has first and second “rigid” edge surfaces. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 30; *id.*, Exhibit 3 at 34, it is my opinion that the Boulevard 70 CS discloses limitation 5(c)(3) for the reasons discussed above for limitation 1(b)(3) in Section XI.A.1.h. For example, a POSA would have understood that the Boulevard 70 CS discloses the surfaces identified in Section XI.A.1.h as the first and second lateral edge surfaces are “rigid” because NUNA0005232 and NUNA0005234 show that the clamps of the lock-offs are made of a rigid material such that no deformation in the clamps is visible when they deflect the belt. *See* NUNA0005232 and NUNA0005234.

**i. [5(c)(4)] “the first and second rigid edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis,”**

1187. Limitation 5(c)(4) is substantially identical to the second portion of limitation 1(b)(3), except that limitation 1(b)(3) states that the surfaces are first and second “lateral” edge surfaces and limitation 5(c)(3) states that the surfaces are first and second “rigid” edge surfaces. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 31; *id.*, Exhibit 3 at 35, it is my opinion that the Boulevard 70 CS discloses limitation 5(c)(4) for the reasons discussed above for limitation 1(b)(3) in Section XI.A.1.h. For example, a POSA would have understood that the Boulevard 70 CS discloses the surfaces identified in Section XI.A.1.h as the first and second

lateral edge surfaces are “rigid” because NUNA0005232 and NUNA0005234 show that the clamps of the lock-offs are made of a rigid material such that no deformation in the clamps is visible when they deflect the belt. *See* NUNA0005232 and NUNA0005234.

**j. [5(d)(1)] “wherein in the first position, the first and second rigid edge surfaces are substantially adjacent to the seat base, and”**

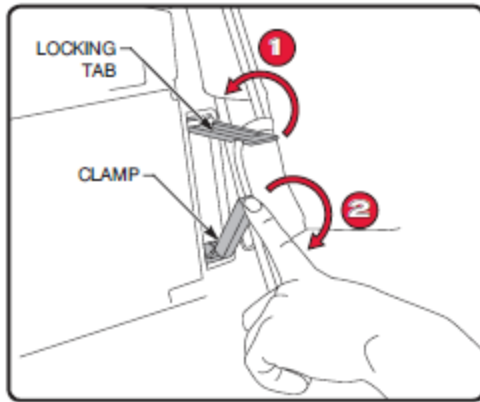
1188. Limitation 5(d)(1) is substantially identical to limitation 1(b)(4), except that limitation 1(b)(4) states that the “tensioning mechanism” is substantially adjacent to the seat base and limitation 5(d)(1) states that the “first and second rigid edge surfaces” are substantially adjacent to the seat base. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 32; *id.*, Exhibit 3 at 36, it is my opinion that the Boulevard 70 CS discloses limitation 5(d)(1) for the reasons discussed above for limitation 1(b)(4) in Section XI.A.1.i. For example, a POSA would have understood that the Boulevard 70 CS discloses the first and second rigid edge surfaces are part of the clamps of the lock-offs, which as stated above in Section XI.A.1.i are substantially adjacent to the seat base when closed.

**k. [5(d)(2)] “wherein in the second position, the first and second rigid edge surfaces are at least partly displaced from the seat base so that the lap section of the vehicle belt and the shoulder section of the vehicle belt are received by the backrest portion from a gap between the first and second rigid edge surfaces and the backrest portion so that application of tension to the vehicle belt retains the child seat in the forward-facing orientation with respect to the vehicle seat,”**

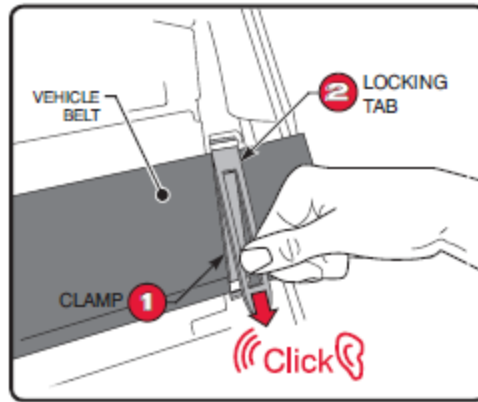
1189. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 33; *id.*, Exhibit 3 at 37, the Boulevard 70 CS discloses that in the second position, the first and second rigid edge surfaces are at least partly displaced from the seat base so that the lap section of the vehicle belt

and the shoulder section of the vehicle belt are received by the backrest portion from a gap between the first and second rigid edge surfaces and the backrest portion so that application of tension to the vehicle belt retains the child seat in the forward-facing orientation with respect to the vehicle seat.

1190. As stated above in Section XI.A.2.f, the clamps of each lock-off in the Boulevard 70 CS are a tensioning mechanism attached to the seat base to be movable between a first position and a second position. The User Guide shows that when the red clamps, which includes the surfaces identified as the first and second rigid edge surfaces in Section XI.A.2.h, are opened, i.e., in the second position, they are at least partly displaced from the seat base so that the lap section of the vehicle belt and the shoulder section of the vehicle belt are received by the backrest portion from a gap between the first and second rigid edge surfaces and the backrest portion so that application of tension to the vehicle belt retains the child seat in the forward-facing orientation with respect to the vehicle seat. For example, the instructions for using the lock-offs in the User Guide state that “[b]oth parts of the lock-off must be opened to secure a vehicle belt.” User Guide, 14. This can also be seen in the corresponding figure, reproduced below. The instructions for rear-facing and forward-facing installation also both instruct the user to open the clamp before routing the belt through the belt slots. *Id.*, 23, 29.

**To Open:**

- 1 Open the locking tab.
- 2 Open the clamp.

**To Close:**

- 1 Close the clamp over the vehicle belt.
- 2 Slide your palm or thumb along the locking tab until a click is heard.

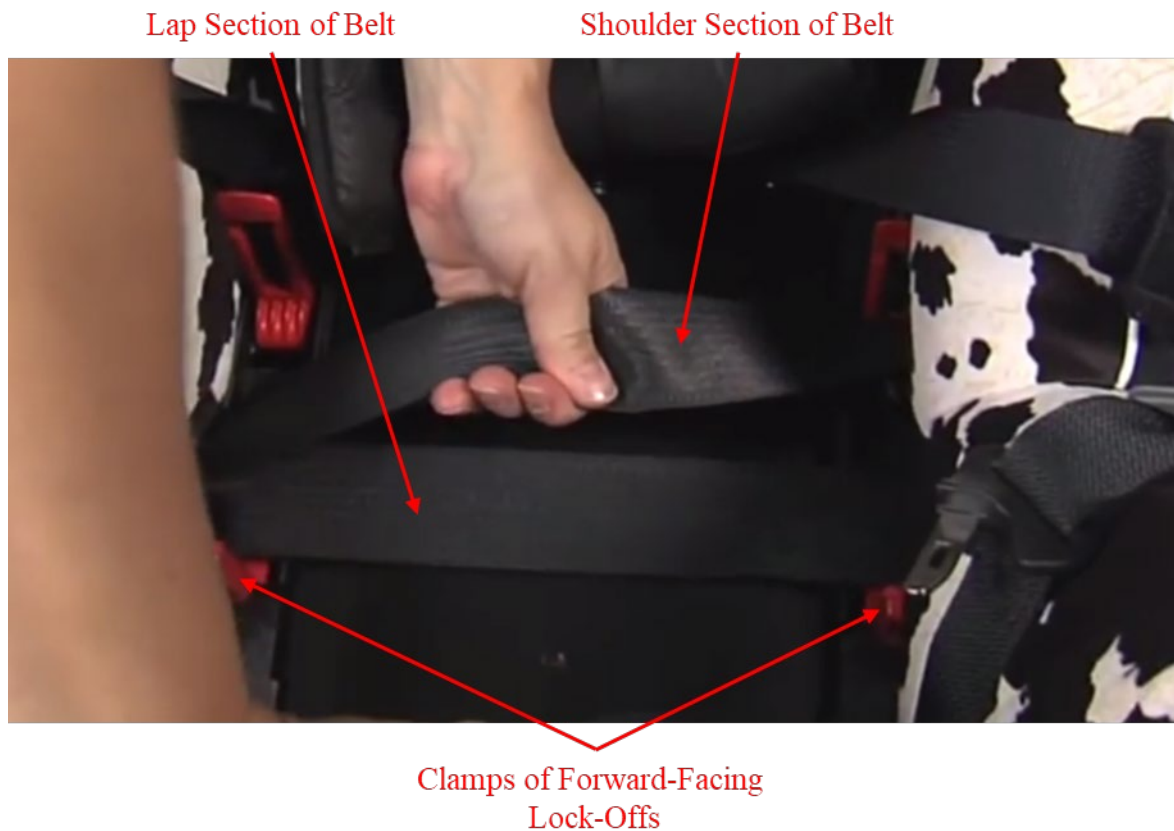
*Id.*, 14.

1191. This is consistent with what is depicted in NUNA0005232 and NUNA0005234, which instruct the user to “open both blue lock-offs by opening the locking tab and then opening the clamp,” NUNA0005234, and “open both red lock-offs by opening the locking tab and then opening the clamp,” NUNA0005232,, before routing the belt through the respective belt paths.

1192. The User Guide and NUNA0005232 both show that the Boulevard 70 CS the lap section of the vehicle belt and the shoulder section of the vehicle belt are received by the backrest portion from a gap between the first and second rigid edge surfaces and the backrest portion so that application of tension to the vehicle belt retains the child seat in the forward-facing orientation with respect to the vehicle seat. The User Guide’s instructions for forward-facing installation using the “lap-shoulder belt” instruct users to “[r]oute the belt through the forward-facing belt slots, then buckle.” User Guide, 29. This can be seen in the screenshot from NUNA0005232 reproduced below, which shows both red clamps open and the lap section and

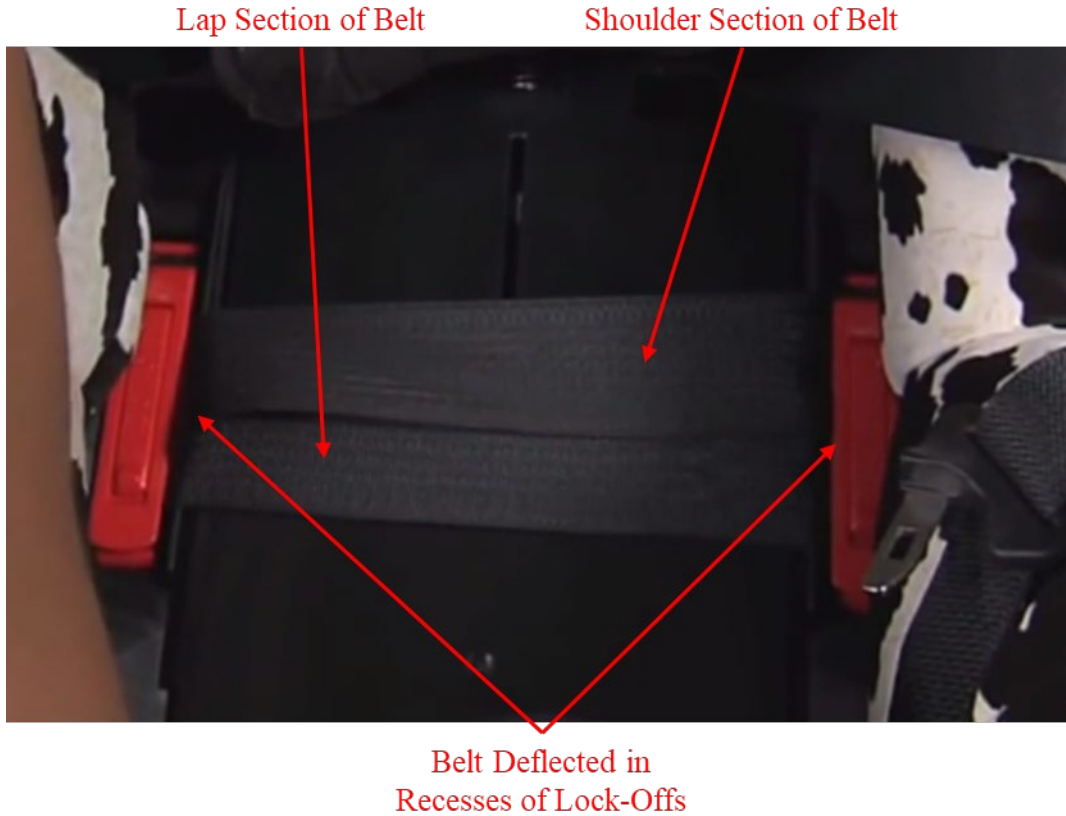


shoulder section of the vehicle belt received by the backrest portion from a gap between the first and second rigid edge surfaces and the backrest portion.



NUNA0005232 (annotated).

1193. The red clamps when closed apply tension to the vehicle belt to retain the child seat in the forward-facing orientation with respect to the vehicle seat, as can be seen in the screenshot below.

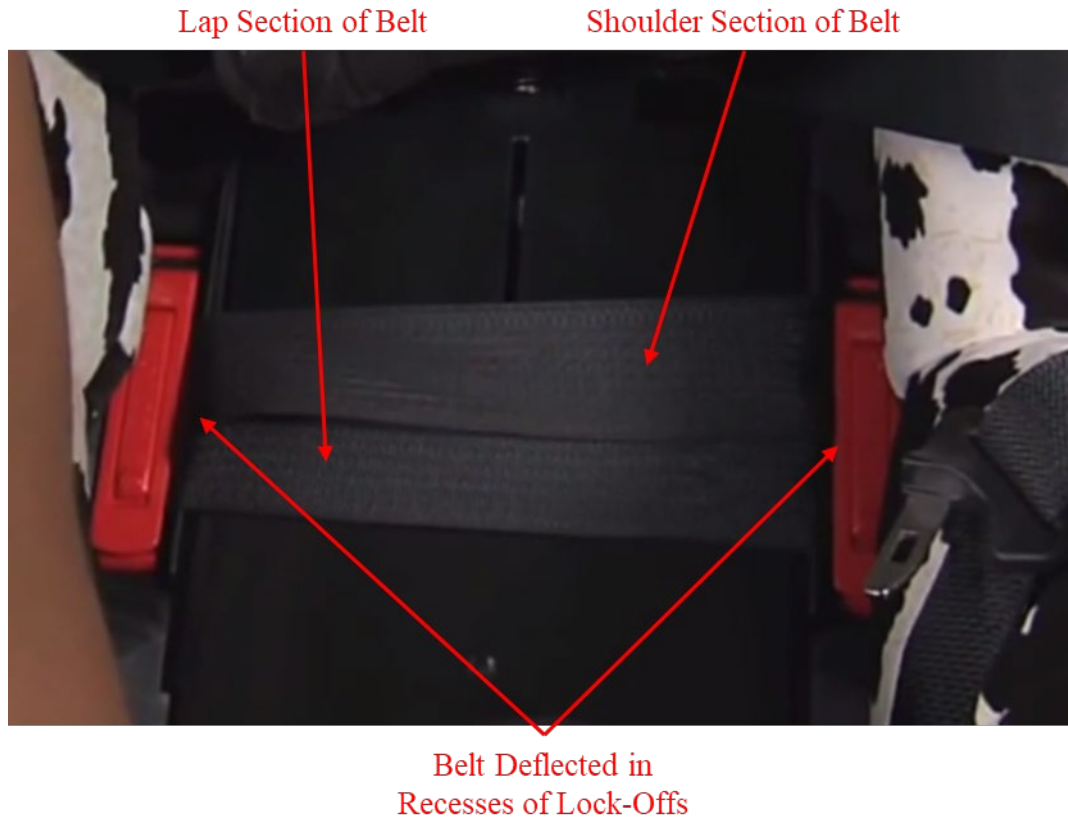


NUNA0005232 (annotated).

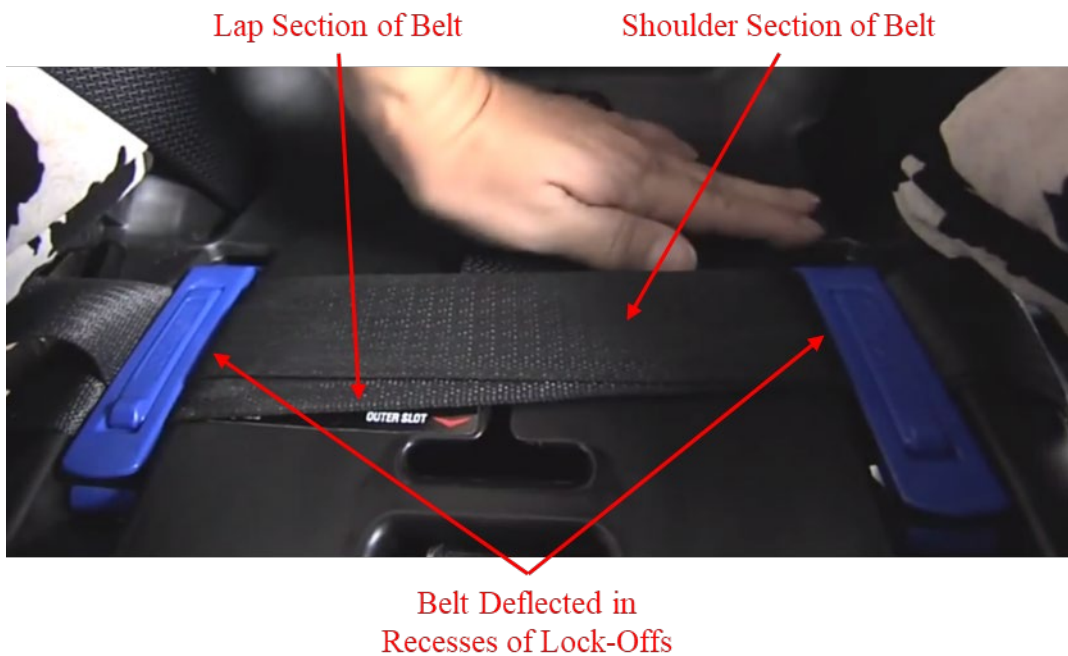
- I. **[5(e)] “wherein movement of the first and second rigid edge surfaces from the second position to the first position causes the first and second rigid edge surfaces to displace a portion of the shoulder section and a portion of the lap section of the vehicle belt with respect to a surface of the backrest portion to thereby increase the tension in the vehicle belt that retains the child seat in the forward-facing orientation,”**

1194. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 34; *id.*, Exhibit 3 at 39, the Boulevard 70 CS discloses that movement of the first and second rigid edge surfaces from the second position to the first position causes the first and second rigid edge surfaces to displace a portion of the shoulder section and a portion of the lap section of the vehicle belt with respect to a surface of the backrest portion to thereby increase the tension in the vehicle belt that retains the child seat in the forward-facing orientation.

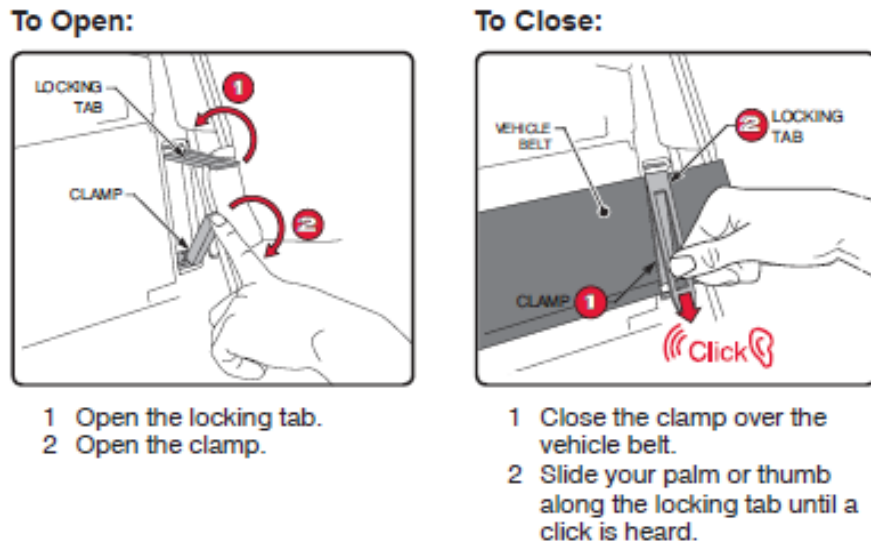
1195. As stated above in Section XI.A.2.k, the clamps of the red lock-offs can be opened such that the lap section of the vehicle belt and the shoulder section of the vehicle belt are received by the backrest portion from a gap between the first and second rigid edge surfaces and the backrest portion so that application of tension to the vehicle belt retains the child seat in the forward-facing orientation with respect to the vehicle seat. As can be seen in NUNA0005232 and NUNA0005234, screenshots of which are shown below, moving the clamp of each lock-off to the closed position causes the first and second rigid edge surfaces of the clamps, identified above in Section XI.A.2.h, to deflect a portion of the shoulder section and a portion of the lap section of the vehicle belt with respect to a surface of the backrest portion to thereby increase the tension in the vehicle belt that retains the child seat in the forward-facing orientation. The clamp portion of each lock-off is what provides the deflection, as stated in the User Guide, which instructs users to “[c]lose the clamp over the vehicle belt,” and seen in NUNA0005232 and NUNA0005234.



NUNA0005232 (annotated).



NUNA0005234 (annotated).



User Guide, 14.

1196. Thus, movement of the first and second rigid edge surfaces of the red clamps from the open to the closed position causes the first and second rigid edge surfaces to displace a portion of the shoulder section and a portion of the lap section of the vehicle belt with respect to a surface of the backrest portion to thereby increase the tension in the vehicle belt that retains the child seat in the forward-facing orientation.

- m. [5(f)] “wherein, in the forward-facing orientation, the first and second rigid edge surfaces of a first portion of the tensioning mechanism displace the belt to apply tension to the belt in the second belt path, and”**

1197. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 36; *id.*, Exhibit 3 at 42, the Boulevard 70 CS discloses that in the forward-facing orientation, the first and second rigid edge surfaces of a first portion of the tensioning mechanism displace the belt to apply tension to the belt in the second belt path.

1198. As discussed above in Section XI.A.2.1 with respect to limitation 5(e), the Boulevard 70 CS discloses that movement of the first and second rigid edge surfaces from the

second position to the first position causes the first and second rigid edge surfaces to displace a portion of the shoulder section and a portion of the lap section of the vehicle belt with respect to a surface of the backrest portion to thereby increase the tension in the vehicle belt that retains the child seat in the forward-facing orientation. For the same reasons discussed in Section XI.A.2.1, the Boulevard 70 CS discloses that in the forward-facing orientation, the first and second rigid edge surfaces of a first portion of the tensioning mechanism displace the belt to apply tension to the belt in the second belt path. Based on how Britax has interpreted this term in its infringement contentions, the first and second rigid edge surfaces of the red clamps are a first portion of the tensioning mechanism and displace the belt to apply tension to the belt in the second belt path.

- n. **[5(g)] “wherein, in the rear-facing orientation, the first and second rigid edge surfaces of a second portion of the tensioning mechanism displace the belt to apply tension to the belt.”**

1199. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 38; *id.*, Exhibit 3 at 45, the Boulevard 70 CS discloses that in the rear-facing orientation, the first and second rigid edge surfaces of a second portion of the tensioning mechanism displace the belt to apply tension to the belt.

1200. As discussed above in Section XI.A.2.d with respect to limitation 5(b)(1), the Boulevard 70 CS includes a rear-facing belt path, i.e., a first belt path. As discussed above in Section XI.A.2.h with respect to limitation 5(c)(3), the blue clamps include first and second rigid edge surfaces based on how Britax’s infringement contentions have apparently interpreted that limitation. Because the blue clamps operate to secure the child seat in the rear-facing position in the same way that red clamps secure the child seat in the forward-facing position, the Boulevard 70 CS discloses that first and second rigid edge surfaces of the blue clamps displace the belt to apply tension to the belt for the same reasons discussed above in Section XI.A.2.1 with respect to

limitation 5(e). Based on how Britax's infringement contentions have apparently interpreted this limitation, the first and second rigid edge surfaces of the blue clamps are a second portion of the tensioning mechanism.

### 3. Independent Claim 9

- a. **[9(p)] "A child seat configured to be secured to a vehicle seat in both a rear-facing and a forward-facing orientation with a vehicle belt, the child seat comprising:"**

1201. Limitation 9(p) is substantially identical to limitation 1(p), except that limitation 1(p) states "by a belt of the vehicle seat" and limitation 9(p) states "with a vehicle belt." It is my opinion that the Boulevard 70 CS discloses limitation 9(p) for the reasons discussed above for limitation 1(p) in Section XI.A.1.a.

- b. **[9(a)(1)] "a seat base comprising a seat portion, a backrest portion, and"**

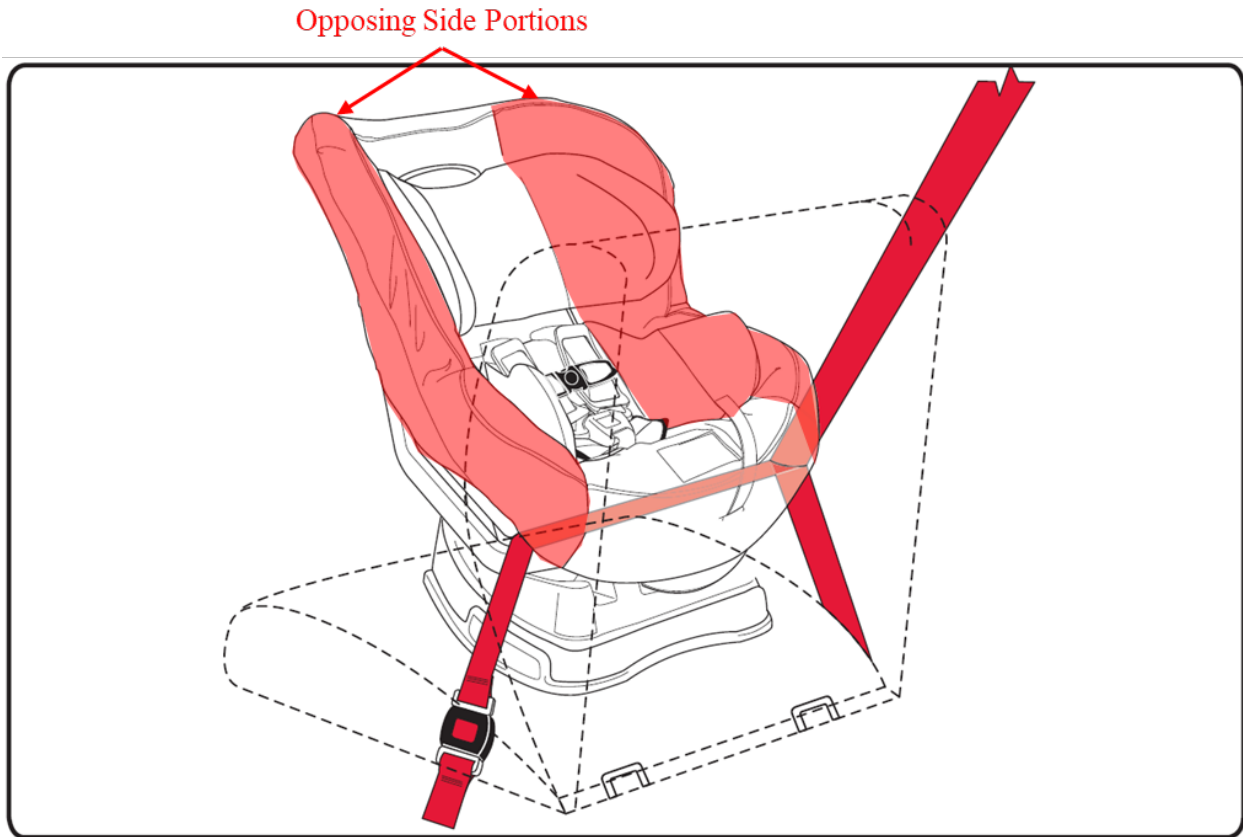
1202. Limitation 9(a)(1) is identical to limitation 1(a)(1). It is my opinion that the Boulevard 70 CS discloses limitation 9(a)(1) for the reasons discussed above for limitation 1(a)(1) in Section XI.A.1.b.

- c. **[9(a)(2)] "opposing side portions that protrude forwardly from the backrest portion and upwardly from the seat portion;"**

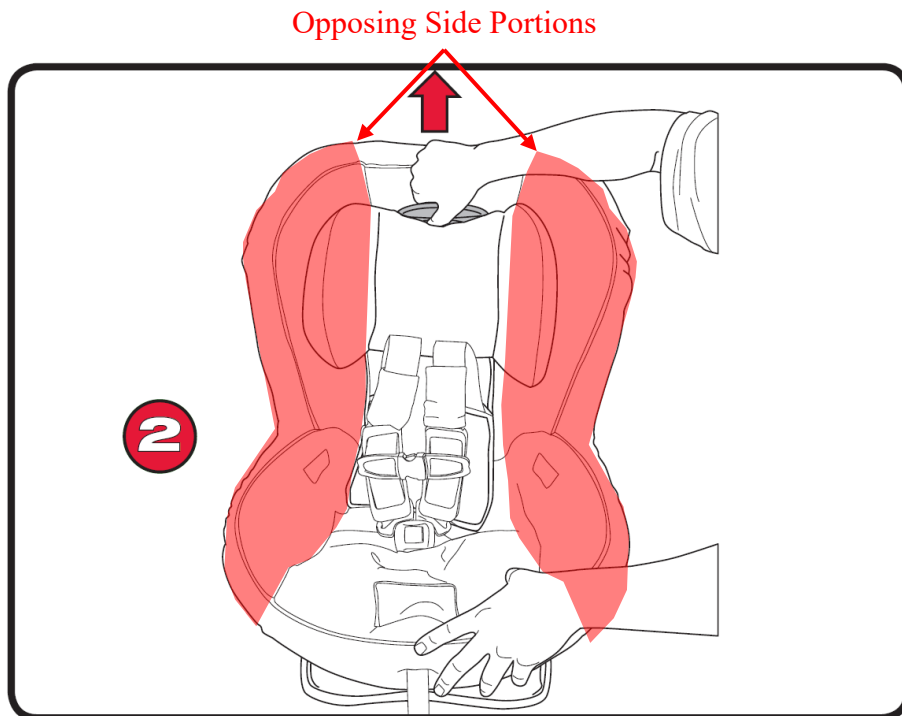
1203. The Boulevard 70 CS discloses opposing side portions that protrude forwardly from the backrest portion and upwardly from the seat portion.

1204. The User Guide depicts the Boulevard 70 as including a seat base comprising opposing side portions that protrude forwardly from the backrest portion and upwardly from the seat portion. Sample depictions of the Boulevard 70 CS from the User Guide are reproduced below.



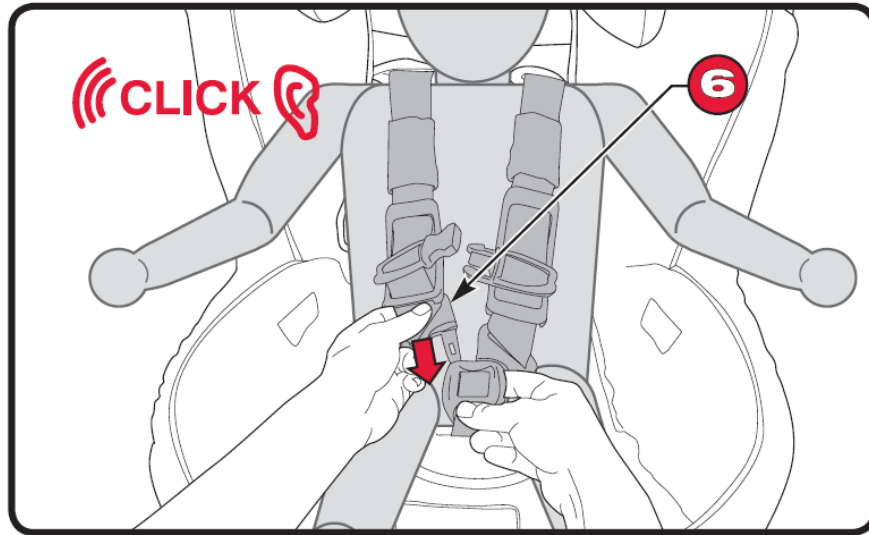


User Guide, 22 (annotated).



*Id.*, 23 (annotated).

1205. The picture from the User Guide, reproduced below, shows that the above-identified opposing side portions of the Boulevard 70 CS protrude forwardly from the backrest portion and upwardly from the seat portion.



*Id.*, 33.

**d. [9(b)(1)] “a first belt path generally at a middle of the seat portion in a forward and rearward direction, and”**

1206. Limitation 9(b)(1) is identical to limitation 1(a)(3). In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 46; *id.*, Exhibit 3 at 55-56, it is my opinion that the Boulevard 70 CS discloses limitation 9(b)(1) for the reasons discussed above for limitation 1(a)(3) in Section XI.A.1.d.

**e. [9(b)(2)] “a second belt path generally at an intersection of the seat and backrest portions; and”**

1207. Limitation 9(b)(2) is identical to limitation 1(a)(4). In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 47; *id.*, Exhibit 3 at 57, it is my opinion that the

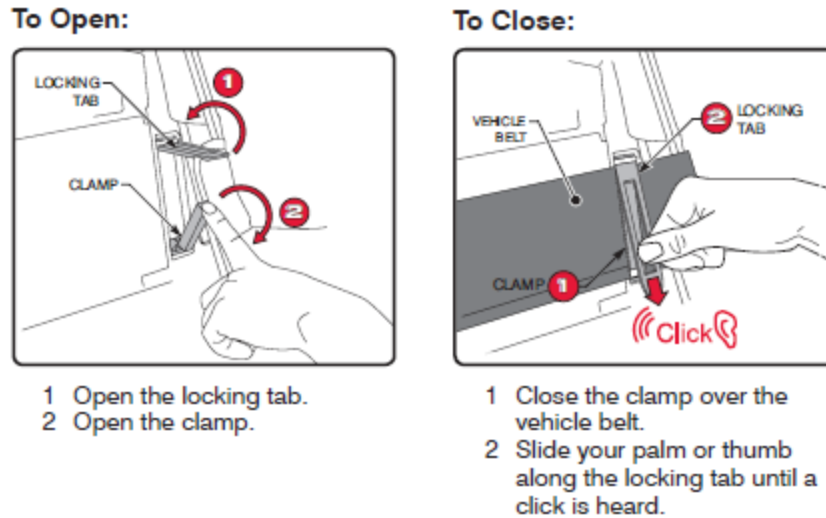
Boulevard 70 CS discloses limitation 9(b)(2) for the reasons discussed above for limitation 1(a)(4) in Section XI.A.1.e.

**f. [9(c)(1)] “a tensioning mechanism attached to the seat base to be movable between a first position and a second position and comprising an engaging surface,”**

1208. The first portion of limitation 9(c)(1) is identical to limitation 1(b)(1). It is my opinion that the Boulevard 70 CS discloses a tensioning mechanism attached to the seat base to be movable between a first position and a second position for the reasons discussed above for limitation 1(b)(1) in Section XI.A.1.f.

1209. The Boulevard 70 CS further discloses the tensioning mechanism comprising an engaging surface. The '504 patent states that “the portion of the tensioning mechanism 330 that contacts the belt 317 and holds the belt 317 against the seat base 305 may be defined as an engaging surface.” '504 patent at 15:56-59. The '504 patent further states that “[t]he engaging surface of the tensioning mechanism 330 may be used to apply tension to the belt 317 by moving the tensioning mechanism 330 from the second position to the first position so that the engaging surface of the tensioning mechanism 330 is adjacent a surface of the seat base 305.” *Id.*, 15:59-64.

1210. As stated above in Section XI.A.1.f, after routing the lap and shoulder portions of the belt through the belt slots and “[p]ush[ing] down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt,” the User Guide instructs users to “lock the lock-off” by “[c]los[ing] the clamp over the vehicle belt” and “[s]lid[ing] your palm or thumb along the locking tab until a click is heard.” User Guide, 23, 29. This is depicted in the instructions for using the lock-offs, reproduced below.



*Id.*, 14.

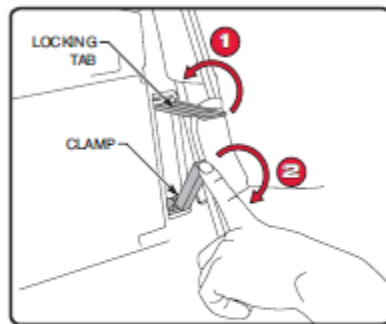
1211. From this disclosure, and from watching the videos in NUNA0005232 and NUNA0005234, a POSA would have understood that the bottom surface of each clamp is engaging surface, in accordance with the description provided in the '504 patent. This is because the clamp is closed “over the vehicle belt,” User Guide, 23, 29, meaning the bottom surface of the clamp is one “portion of the tensioning mechanism 330 that contacts the belt 317 and holds the belt 317 against the seat base,” '504 patent at 15:56-59.

- g. **[9(c)(2)] “the tensioning mechanism having an end attached to the backrest portion such that the tensioning mechanism is configured to rotate downwardly to the first position from the second position about an axis, and”**

1212. Limitation 9(c)(2) is substantially identical to limitation 1(b)(2), except that limitation 1(b)(2) states that the end is attached to the backrest portion “at an axis” and the tensioning mechanism “rotates between the first position and the second position pivotally about the axis,” and limitation 9(c)(2) states that the tensioning mechanism “is configured to rotate downwardly to the first position from the second position about an axis.” It is my opinion that the Boulevard 70 CS discloses limitation 9(c)(2) for the reasons discussed above for limitation

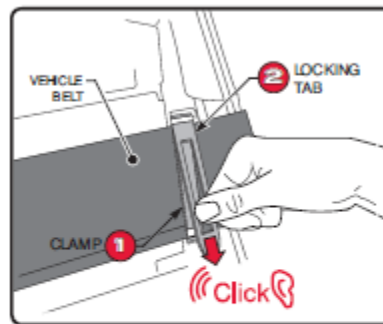
1(b)(2) in Section XI.A.1.g. For example, it is my opinion that the term “rotate downwardly” is referring to rotating the free end of the tensioning mechanism toward the seat base. After routing the lap and shoulder portions of the belt through the belt slots and “[p]ush[ing] down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt,” the User Guide instructs users to “lock the lock-off” by “[c]los[ing] the clamp over the vehicle belt” and “[s]lid[ing] your palm or thumb along the locking tab until a click is heard.” User Guide, 23, 29. As can be seen below in the depiction and corresponding description of the lock-offs in the User Guide, each of the clamps of the lock-offs in the Boulevard rotate downwardly from the open position to the closed position.

**To Open:**



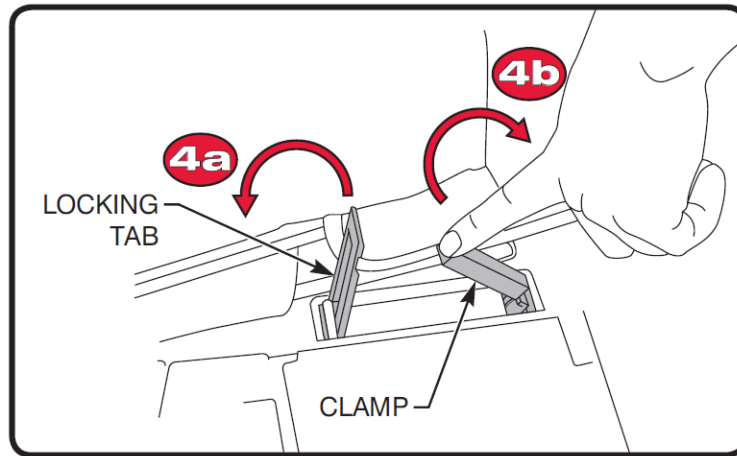
- 1 Open the locking tab.
- 2 Open the clamp.

**To Close:**



- 1 Close the clamp over the vehicle belt.
- 2 Slide your palm or thumb along the locking tab until a click is heard.

*Id.*, 14.



*Id.*, 23.

**h. [9(c)(3)] “wherein the tensioning mechanism has a first lateral edge surface and a second lateral edge surface,”**

1213. Limitation 9(c)(3) is identical to the first part of limitation 1(b)(3). In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 51; *id.*, Exhibit 3 at 62, it is my opinion that the Boulevard 70 CS discloses limitation 9(c)(3) for the reasons discussed above for limitation 1(b)(3) in Section XI.A.1.h.

**i. [9(c)(4)] “the first and second lateral edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis,”**

1214. Limitation 9(c)(4) is identical to the second part of limitation 1(b)(3). In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 52; *id.*, Exhibit 3 at 63, it is my opinion that the Boulevard 70 CS discloses limitation 9(c)(4) for the reasons discussed above for limitation 1(b)(3) in Section XI.A.1.h.

**j. [9(d)] “wherein in the first position, the first and second lateral edge surfaces are substantially adjacent to the seat base”**

1215. Limitation 9(d) is substantially identical to limitation 1(b)(4), except that limitation 1(b)(4) states that the “tensioning mechanism” is substantially adjacent to the seat base, and limitation 9(d) states that the “first and second lateral edge surfaces” are substantially adjacent to the seat base. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 53; *id.*, Exhibit 3 at 64, it is my opinion that the Boulevard 70 CS discloses limitation 9(d) for the reasons discussed above for limitation 1(b)(4) in Section XI.A.1.i.

**k. [9(e)] “wherein in the second position, the first and second lateral edge surfaces are at least partly displaced from the seat base in order to receive the vehicle belt,”**

1216. Limitation 9(e) is substantially identical to limitation 1(b)(5), except that limitation 1(b)(5) states that the “tensioning mechanism” is at least partly displaced from the seat base in order to “enable at least one of the first belt path or the second belt path to receive the belt,” and limitation 9(e) states that the “first and second lateral edge surfaces” are at least partly displaced from the seat base in order to “receive the vehicle belt.” In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 54; *id.*, Exhibit 3 at 65, it is my opinion that the Boulevard 70 CS discloses limitation 9(e) for the reasons discussed above for limitation 1(b)(5) in Section XI.A.1.j.



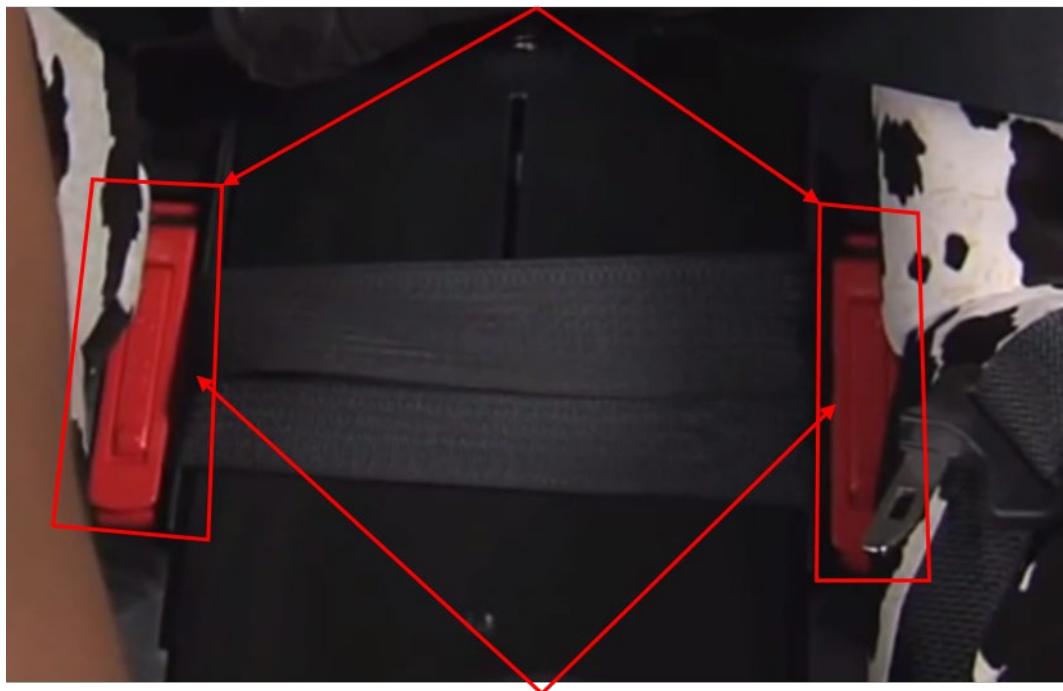
- I. **[9(f)] “wherein movement of the first and second lateral edge surfaces from the second position to the first position causes the engaging surface, which is disposed between the first and second lateral edge surfaces, to press a first portion of the vehicle belt against the opposing side portions and deflect a second portion of the vehicle belt to be closer to the seat portion or backrest portion than the first portion of the vehicle belt in order to apply tension to the vehicle belt to secure the child seat to the vehicle seat in a tensioned configuration, and”**

1217. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 55; *id.*, Exhibit 3 at 66, the Boulevard 70 CS discloses that movement of the first and second lateral edge surfaces from the second position to the first position causes the engaging surface, which is disposed between the first and second lateral edge surfaces, to press a first portion of the vehicle belt against the opposing side portions and deflect a second portion of the vehicle belt to be closer to the seat portion or backrest portion than the first portion of the vehicle belt in order to apply tension to the vehicle belt to secure the child seat to the vehicle seat in a tensioned configuration.

1218. As stated above in Section XI.A.3.k, the clamps of the red lock-offs can be opened such that the forward-facing belt path can receive the belt, and the clamps of the blue lock-offs can be opened such that the rear-facing belt path can receive the belt. As can be seen in NUNA0005232 and NUNA0005234, screenshots of which are shown below, moving the clamp of each lock-off to the closed position causes the engaging surface of the clamps, identified above in Section XI.A.3.f, to press a first portion of the vehicle belt against the opposing side portions and deflect a second portion of the vehicle belt to be closer to the seat portion or backrest portion than the first portion of the vehicle belt in order to apply tension to the vehicle belt to secure the child seat to the vehicle seat in a tensioned configuration. The clamp portion of each lock-off is what provides the deflection, as stated in the User Guide, which instructs users to “[c]lose the clamp over the vehicle belt,” and seen in NUNA0005232 and NUNA0005234. The

below pictures show that when the clamps of the lock-offs are closed, the portion of the vehicle belt engaged by the clamps is closed to the seat portion or backrest portion than the portion of the vehicle belt that presses against the opposing side portions.

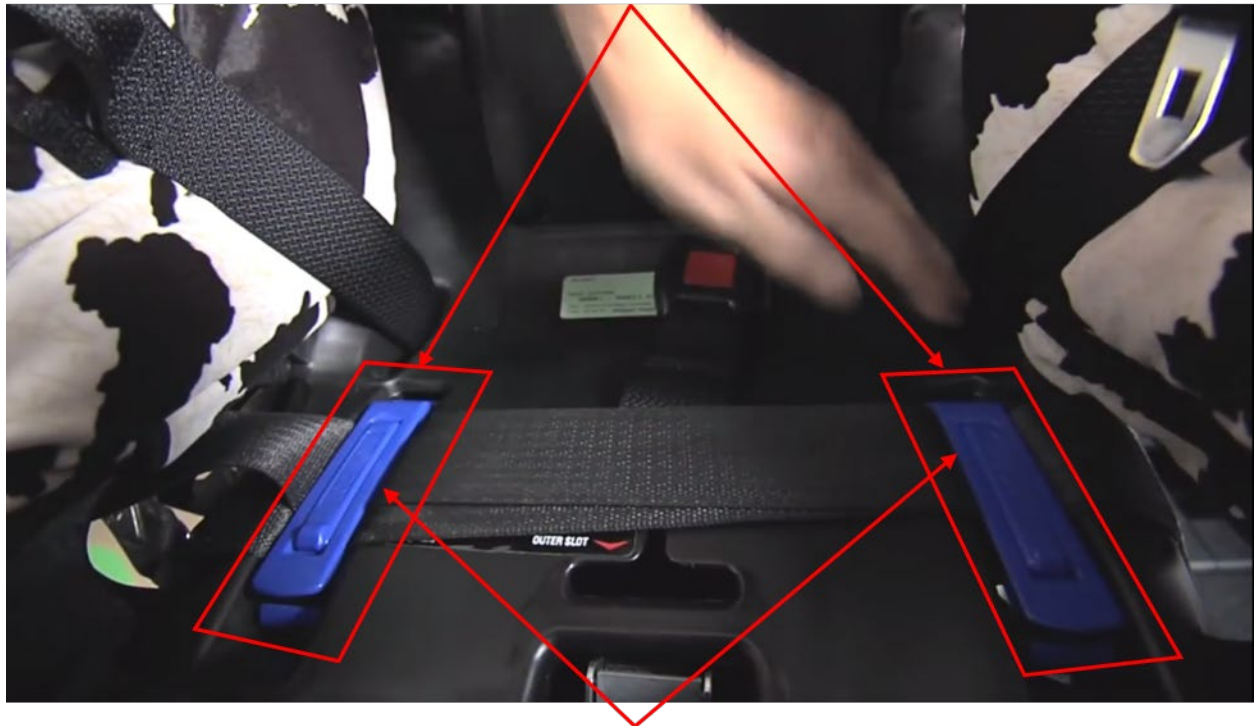
Forward-Facing Lock-Offs



Belt Deflected in  
Recesses of Lock-Offs

NUNA0005232 (annotated).

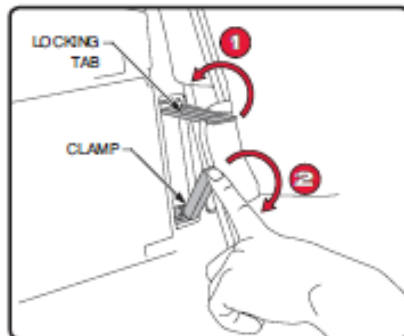
### Rear-Facing Lock-Offs



### Belt Deflected in Recesses of Lock-Offs

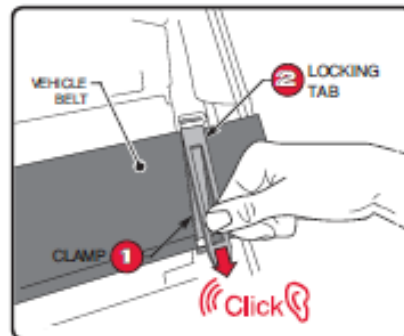
NUNA0005234 (annotated).

#### To Open:



- 1 Open the locking tab.
- 2 Open the clamp.

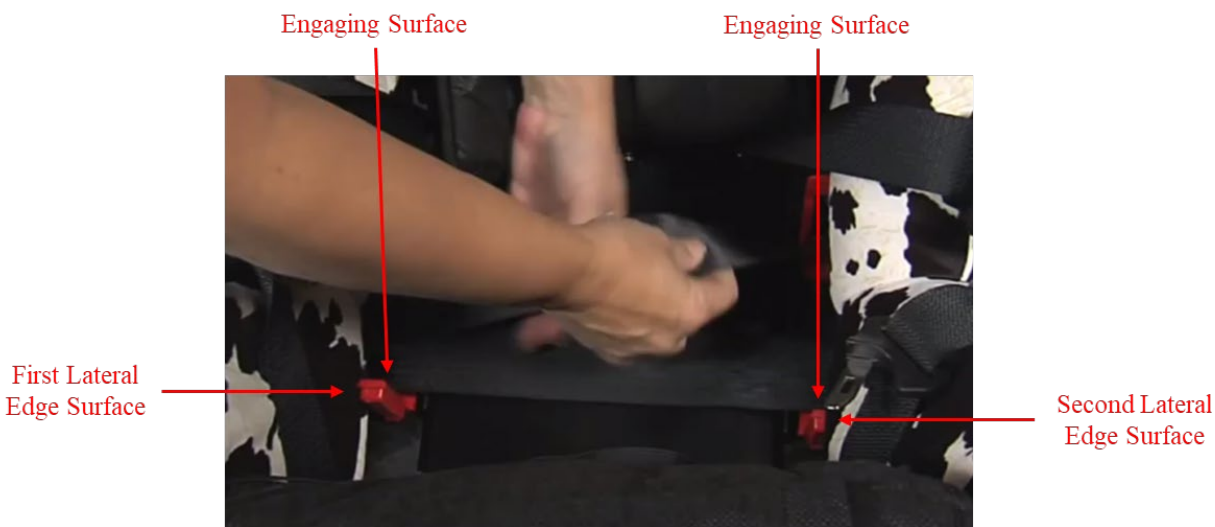
#### To Close:



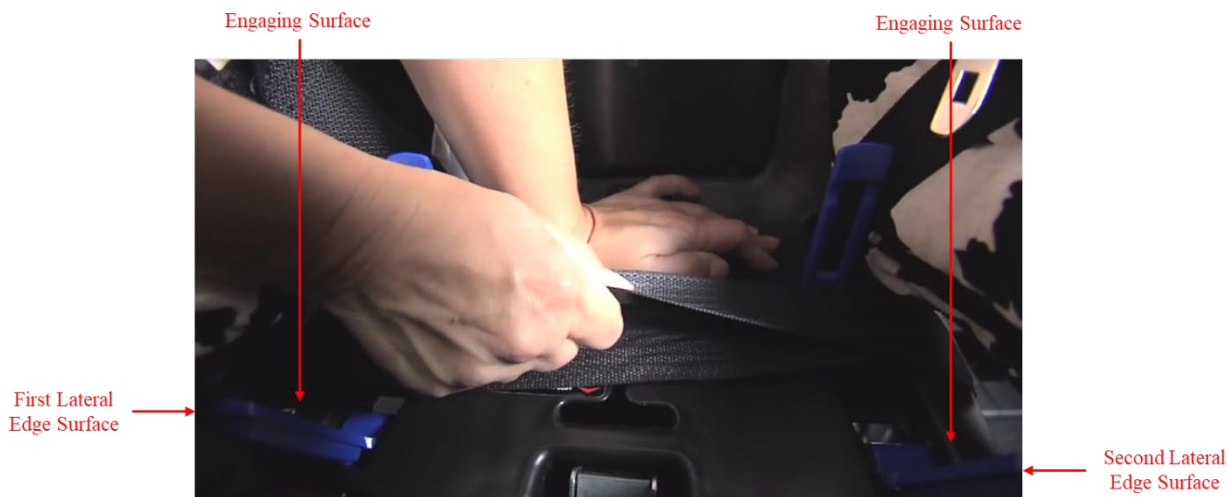
- 1 Close the clamp over the vehicle belt.
- 2 Slide your palm or thumb along the locking tab until a click is heard.

User Guide, 14.

1219. The bottom surface of the clamps, identified above in Section XI.A.3.f as the engaging surface, is disposed between the outer surfaces of the clamps making up the tensioning mechanism. The screenshots from NUNA0005232 and NUNA0005234 reproduced below show how the engaging surface is disposed between the first and second lateral edge surfaces.



NUNA0005232 (annotated).



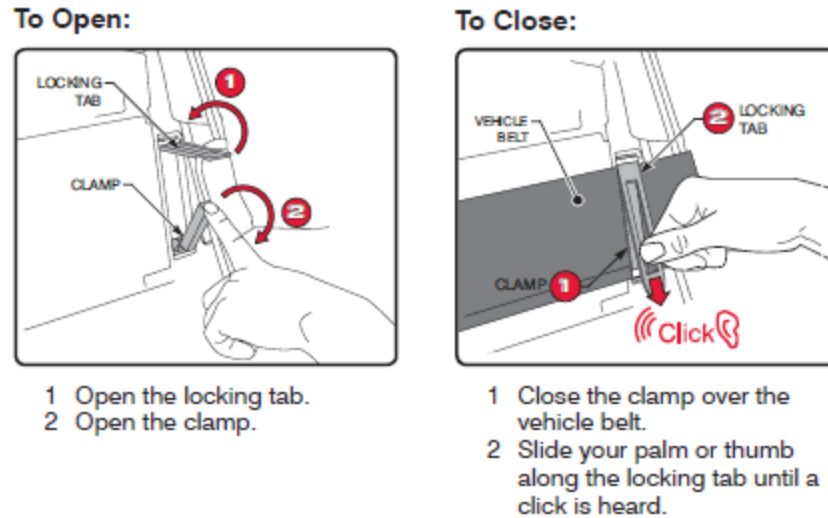
NUNA0005234 (annotated).

1220. Thus, movement of the first and second lateral edge surfaces of the clamps from the open to the closed position causes the bottom surface of the clamps to press a first portion of

the vehicle belt against the opposing side portions and deflect a second portion of the vehicle belt to be closer to the seat portion or backrest portion than the first portion of the vehicle belt in order to apply tension to the vehicle belt to secure the child seat to the vehicle seat in a tensioned configuration.

- m. **[9(g)] “wherein in each of the forward or rear-facing orientations, respective different portions of the first and second lateral edge surfaces of the tensioning mechanism displace the belt to apply tension to the belt.”**

1221. Limitation 9(g) is substantially identical to limitation 1(d) except that limitation 1(d) states “the first and second lateral edge surfaces of respective different portions of the tensioning mechanism” and limitation 9(g) states “respective different portions of the first and second lateral edge surfaces of the tensioning mechanism.” In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 56; *id.*, Exhibit 3 at 68, it is my opinion that the Boulevard 70 CS discloses limitation 9(g) for the reasons discussed above for limitation 1(d) in Section XI.A.1.m. For example, the surfaces of the clamps identified above in Section XI.A.3.1 in the annotated screenshots from NUNA0005232 and NUNA0005234, in addition to the surfaces identified as the engaging surface, each displace the belt to apply tension to the belt. A POSA would have understood that this is the case from NUNA0005232 and NUNA0005234 and from the depiction of the lock-offs in use in the User Guide, reproduced below.



User Guide, 14.

#### 4. Independent Claim 13

- a. **[13(p)] “A child seat configured to be secured to a vehicle seat in both a rear-facing and a forward-facing orientation by a belt of the vehicle seat, the child seat comprising:”**

1222. Limitation 13(p) is identical to limitation 1(p). It is my opinion that the Boulevard 70 CS discloses limitation 13(p) for the reasons discussed above for limitation 1(p) in Section XI.A.1.a.

- b. **[13(a)(1)] “a seat base comprising a seat portion, a backrest portion,”**

1223. Limitation 13(a)(1) is identical to limitation 1(a)(1). It is my opinion that the Boulevard 70 CS discloses limitation 13(a)(1) for the reasons discussed above for limitation 1(a)(1) in Section XI.A.1.b.

- c. **[13(a)(2)] “a first belt path generally at a middle of the seat portion in a forward and rearward direction, and”**

1224. Limitation 13(a)(2) is identical to limitation 1(a)(3). In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 65; *id.*, Exhibit 3 at 78-79, it is my opinion that the

Boulevard 70 CS discloses limitation 13(a)(2) for the reasons discussed above for limitation 1(a)(3) in Section XI.A.1.d.

**d. [13(a)(3)] “a second belt path generally at an intersection of the seat and backrest portions,”**

1225. Limitation 13(a)(3) is identical to limitation 1(a)(4). In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 66; *id.*, Exhibit 3 at 80, it is my opinion that the Boulevard 70 CS discloses limitation 13(a)(3) for the reasons discussed above for limitation 1(a)(4) in Section XI.A.1.e.

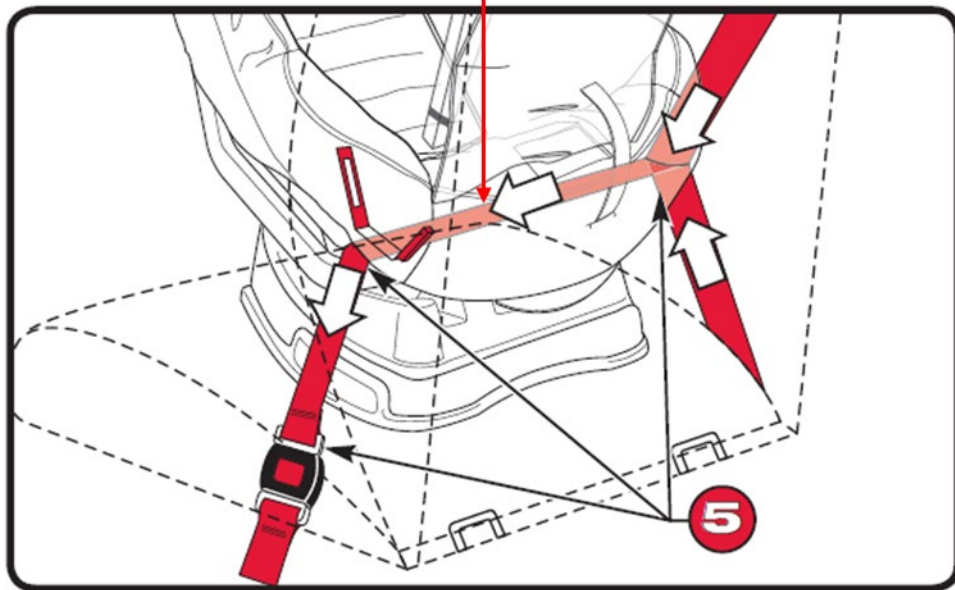
**e. [13(a)(4)] “first and second lateral edges that protrude forwardly and upwardly from opposing sides of the backrest portion proximate to the second belt path, third and fourth lateral edges that protrude forwardly and upwardly from opposing sides of the seat portion proximate to the first belt path;”**

1226. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 67; *id.*, Exhibit 3 at 82, the Boulevard 70 CS discloses first and second lateral edges that protrude forwardly and upwardly from opposing sides of the backrest portion proximate to the second belt path, third and fourth lateral edges that protrude forwardly and upwardly from opposing sides of the seat portion proximate to the first belt path.

1227. The User Guide depicts the Boulevard 70 as including a seat base comprising first and second lateral edges that protrude forwardly and upwardly from the opposing sides of the backrest portion proximate to the second belt path and third and fourth lateral edges that protrude forwardly and upwardly from opposing sides of the seat portion proximate to the first belt path. Sample depictions of the Boulevard 70 CS from the User Guide are reproduced below.

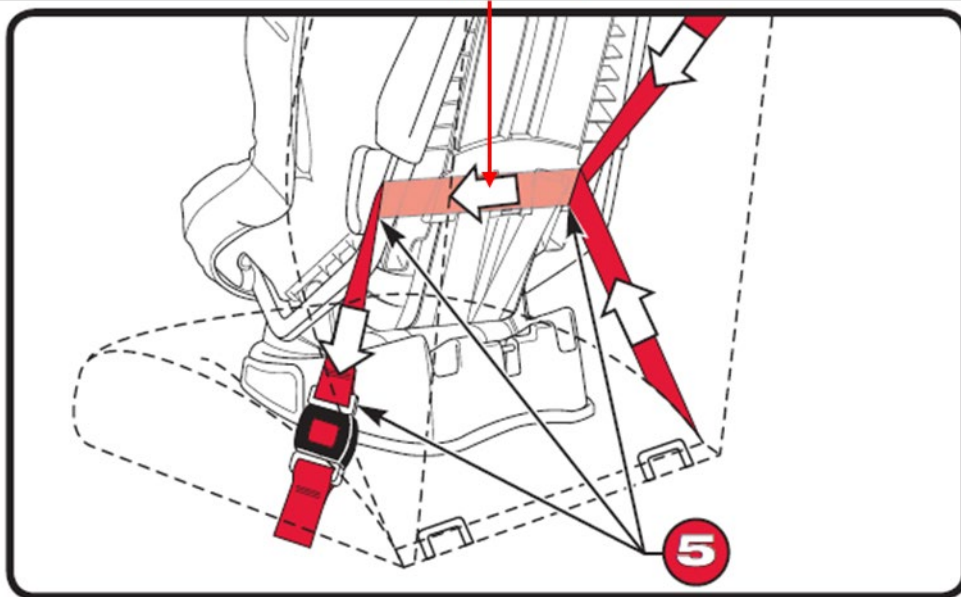


Rear-Facing (First) Belt Path

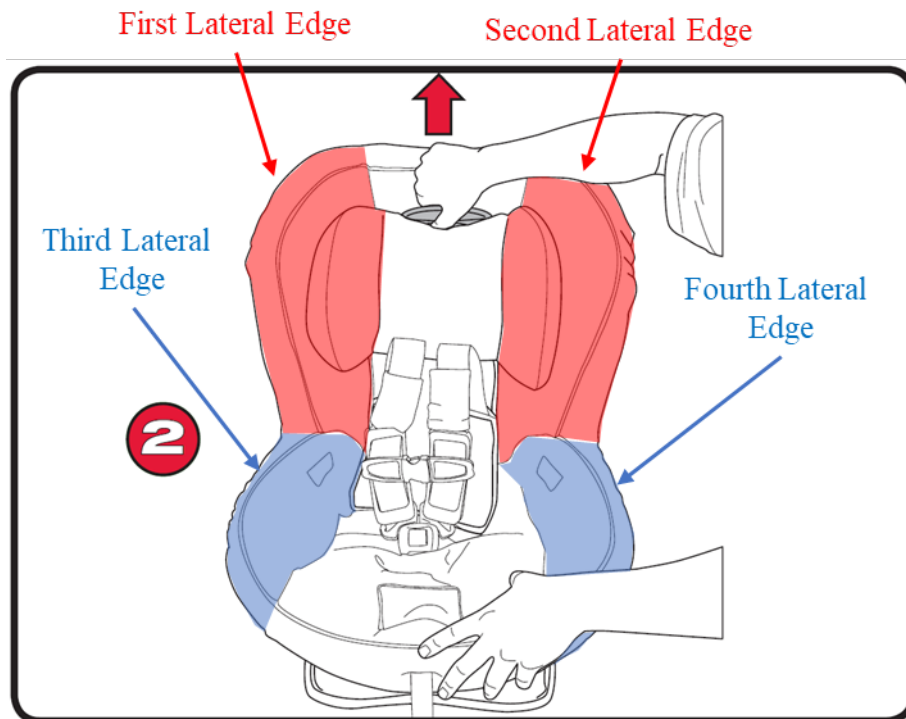


User Guide, 23 (annotated).

Forward-Facing (Second) Belt Path

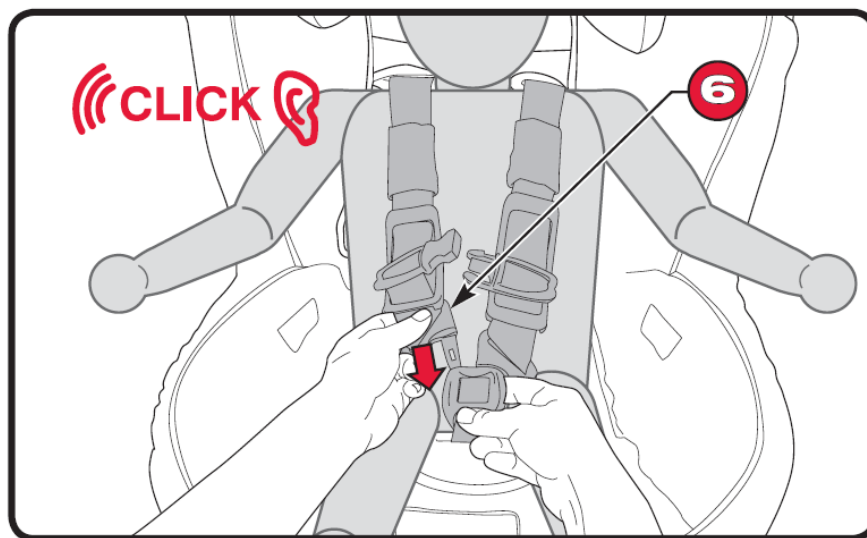


*Id.*, 29 (annotated).



*Id.*, 23 (annotated).

1228. The picture from the User Guide, reproduced below, shows that the above-identified lateral edges of the Boulevard 70 CS protrude forwardly and upwardly from their respective portions of the seat base.

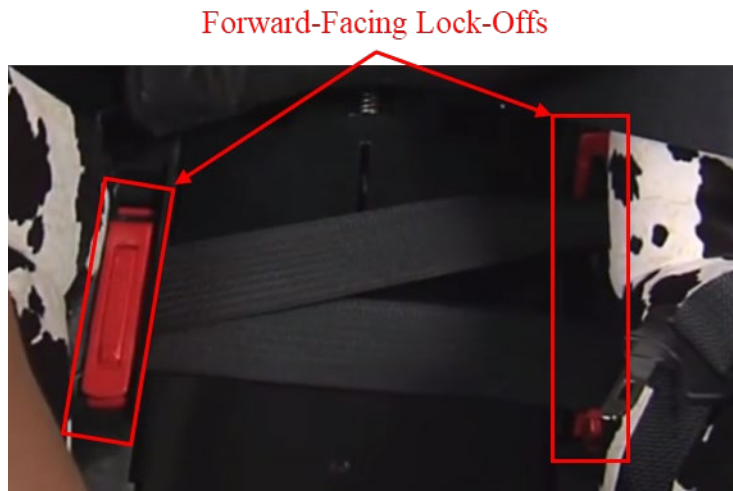


*Id.*, 33.

- f. **[13(b)(1)] “a pivot structure having a first pivot portion comprising a first lateral edge member and a second lateral edge member,”**

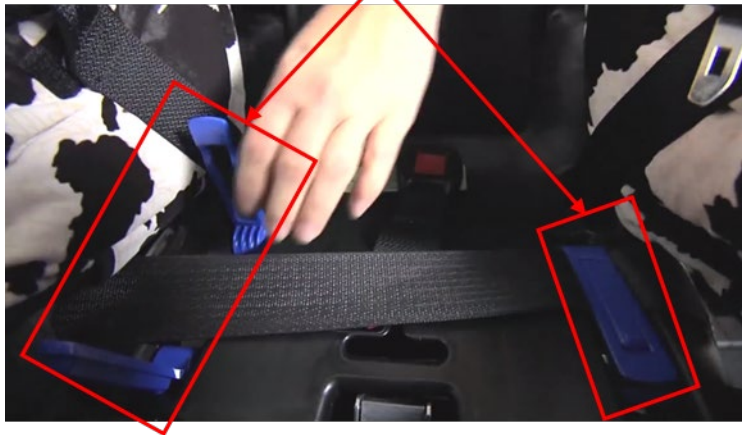
1229. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 68; *id.*, Exhibit 3 at 83, the Boulevard 70 CS discloses a pivot structure having a first pivot portion comprising a first lateral edge member and a second lateral edge member

1230. As shown below in screenshots from NUNA0005232 and NUNA0005234, the Boulevard 70 CS includes four lock-offs: two for each of the first and second belt paths.



NUNA0005232 (annotated, showing the forward-facing lock-offs, with one open and one closed).

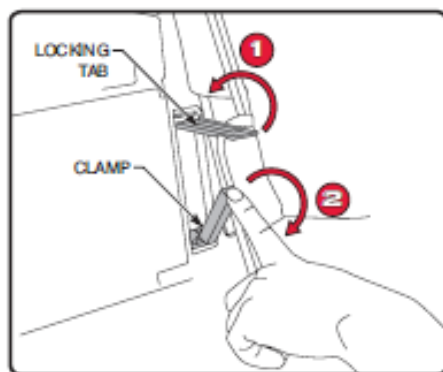
### Rear-Facing Lock-Offs



NUNA0005234 (annotated, showing the rear-facing lock-offs, with one open and one closed).

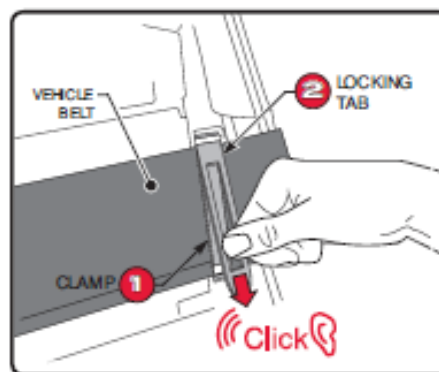
1231. The User Guide for the Boulevard 70 CS provides instructions on how to use the lock-offs. User Guide, 14. It states that “[b]oth parts of the lock-off must be opened to secure a vehicle belt.” *Id.* It also states that the lock-off includes a “locking tab” and a “clamp.” *Id.* The instructions, reproduced below, show that the clamp displaces the belt and the locking tab locks the clamp in place to retain the belt in a tensioned state. *Id.* Based on this disclosure, a POSA would have understood that the clamp of each lock-off is a pivot structure.

#### To Open:



- 1 Open the locking tab.
- 2 Open the clamp.

#### To Close:



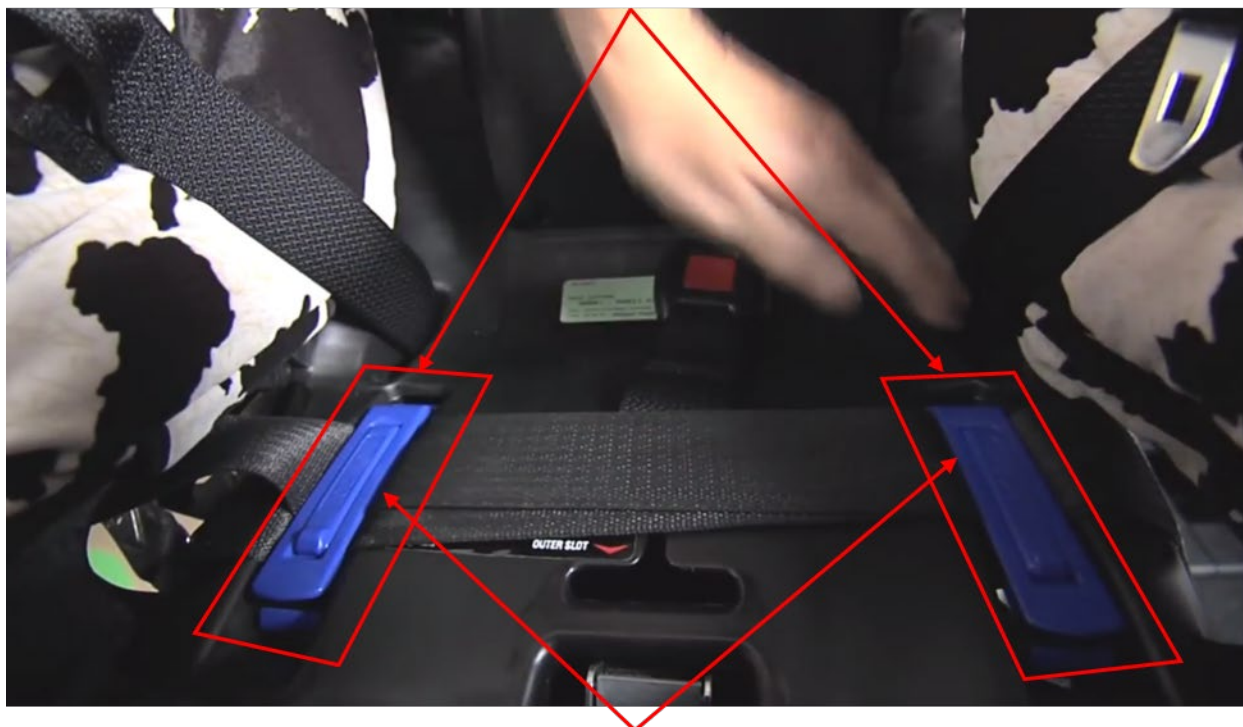
- 1 Close the clamp over the vehicle belt.
- 2 Slide your palm or thumb along the locking tab until a click is heard.

*Id.*

1232. The User Guide provides instructions on the use of the lock-offs for the forward- and rear-facing installation. For both installations, it instructs users to “[o]pen the locking tab” and “open the clamp” off the lock-off. *Id.* 23, 29. After routing the lap and shoulder portions of the belt through the belt slots and “[p]ush[ing] down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt,” it instructs users to “lock the lock-off” by “[c]los[ing] the clamp over the vehicle belt” and “[s]lid[ing] your palm or thumb along the locking tab until a click is heard.” *Id.* These instructions are consistent with what is conveyed in NUNA005232 and NUNA0005234, except the User Guide instructs users to only use one of the lock-offs in each belt path, and NUNA005232 and NUNA0005234 instruct users to use both. *See* NUNA005232 and NUNA0005234.

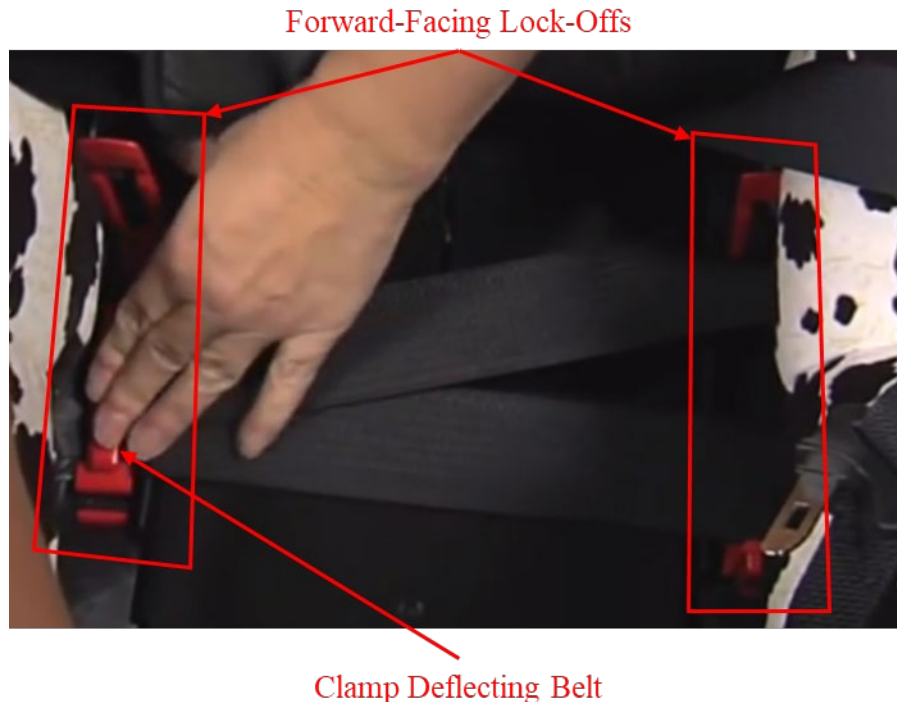
1233. As can be seen in NUNA0005234, the clamp of each lock-off deflects the belt within a recess in the seat base, thereby adding tension to the belt. The clamp portion of each lock-off is what provides the deflection, as stated in the User Guide, which instructs users to “[c]lose the clamp over the vehicle belt,” and seen in NUNA005232 and NUNA0005234.

Rear-Facing Lock-Offs



Belt Deflected in  
Recesses of Lock-Offs

NUNA0005234 (annotated).



NUNA0005232 (annotated, showing belt deflection caused by the clamp of a lock-off).

1234. Based on these disclosures of the Boulevard 70 CS and how Britax has apparently interpreted the term “pivot structure” in its infringement contentions, a POSA would have understood that the clamps of each lock-off are a pivot structure, and the red clamps constitute a first lateral edge member, i.e., the clamp on one side of the forward-facing belt path, and a second lateral edge member, i.e., the clamp on the other side of the forward-facing belt path.

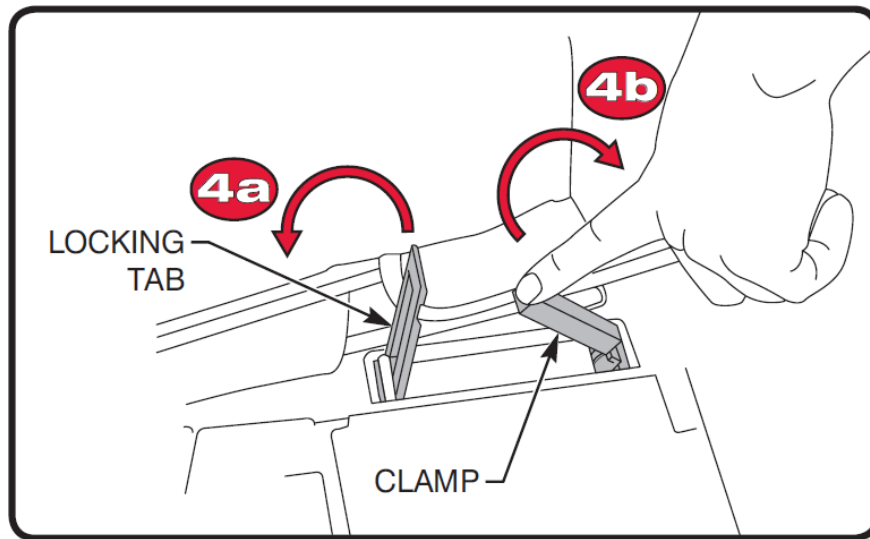
- g. **[13(b)(2)] “the pivot structure attached to the backrest portion at an axis such that the pivot structure rotates between a first position and a second position pivotally about the axis, the first and second lateral edge members extending away from the backrest and substantially perpendicular to the axis,”**

1235. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 69; *id.*, Exhibit 3 at 85, the Boulevard 70 CS discloses the pivot structure attached to the backrest portion at an axis such that the pivot structure rotates between a first position and a second position pivotally

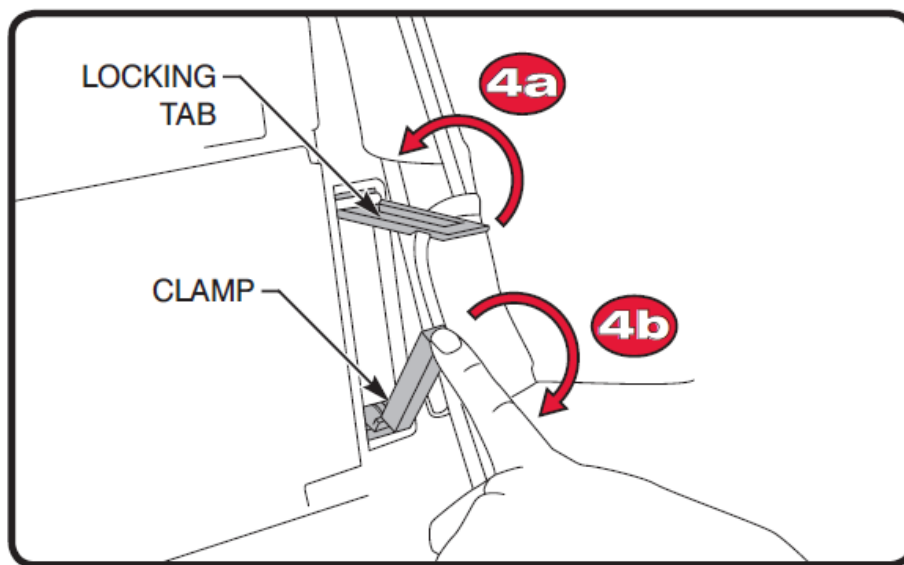


about the axis, the first and second lateral edge members extending away from the backrest and substantially perpendicular to the axis.

1236. As stated above in Section XI.A.4.f, the Boulevard 70 CS discloses that the clamps of each lock-off are a pivot structure. As the depictions of the clamps in the User Guide reproduced below indicate, each clamp is attached to the seat base at an axis such that they rotate between an open and closed position pivotally about the axis.

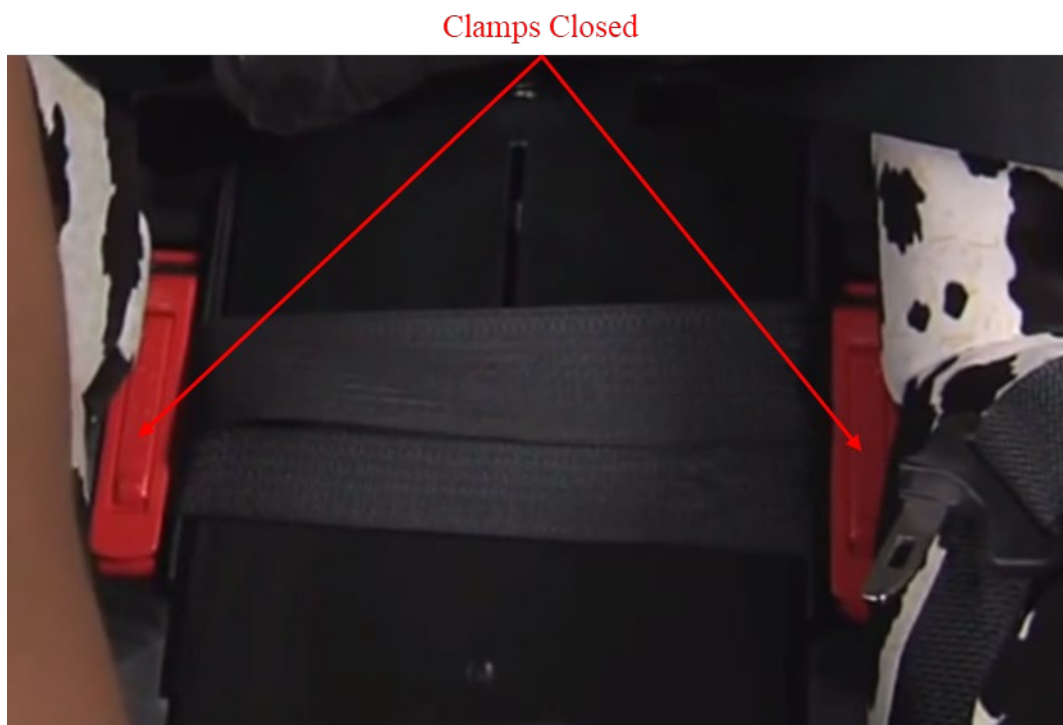


User Guide, 23.

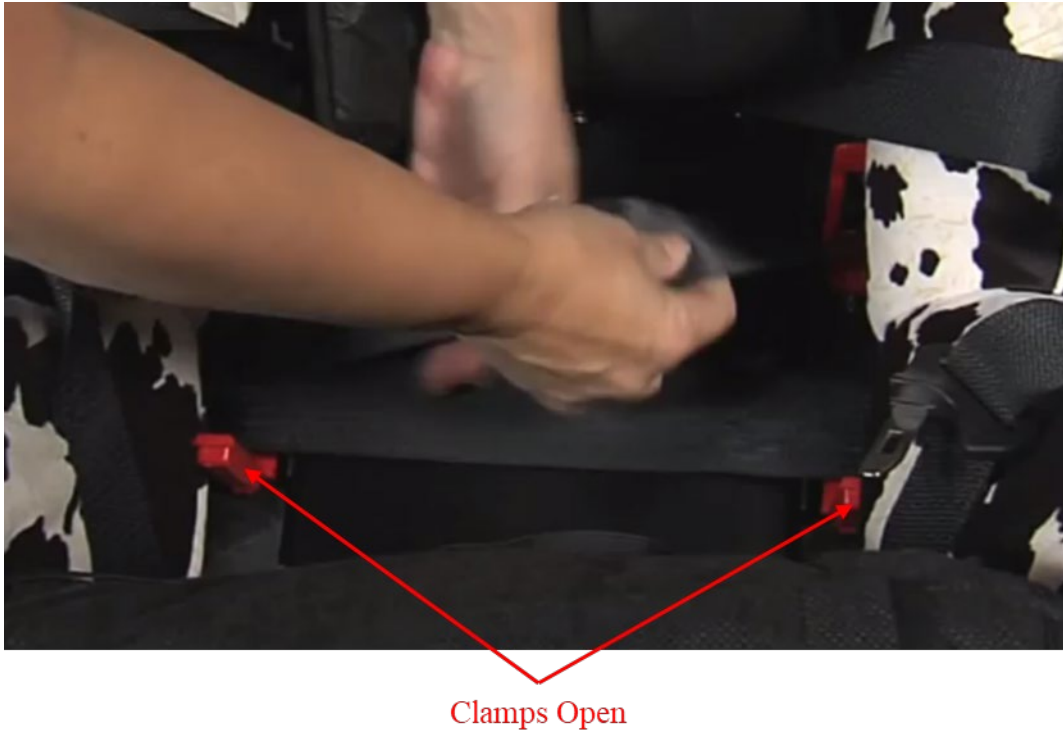


*Id.*, 29.

1237. As shown below in the screenshots from NUNA0005232, the red clamps for the forward-facing belt path are attached to the backrest at an axis such that they rotate between a closed position, i.e., a first position, and an open position, i.e., a second position, pivotally about the axis. The below screenshots also show that the red clamps extend away from the backrest and substantially perpendicular to the axis.



NUNA0005232 (first position) (annotated).



*Id.* (second position) (annotated).

- h. **[13(b)(3)] “wherein in the first position, the first pivot portion is substantially adjacent to the seat base, and wherein in the second position, the first pivot portion is at least partly displaced from the seat base in order to enable the second belt path to receive the belt;”**

1238. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 70; *id.*, Exhibit 3 at 86, the Boulevard 70 CS discloses that in the first position, the first pivot portion is substantially adjacent to the seat base, and wherein in the second position, the first pivot portion is at least partly displaced from the seat base in order to enable the second belt path to receive the belt.

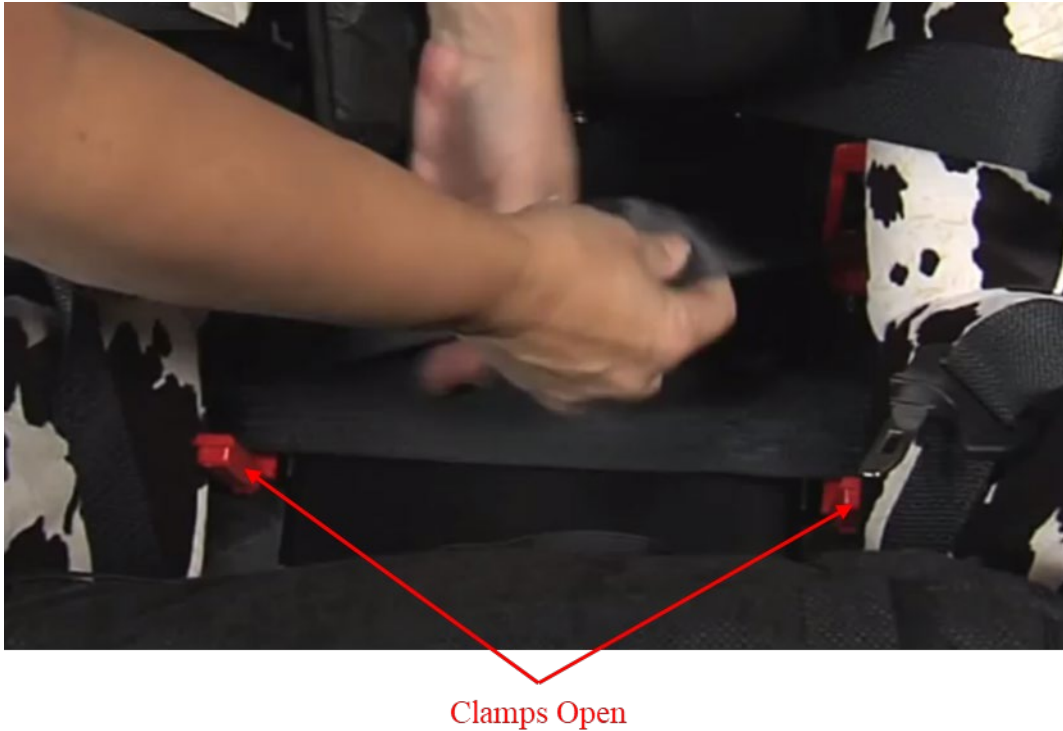
1239. As stated above in Section XI.A.4.g, the red clamps, i.e., the first pivot portion, rotates to a closed, i.e., first position, and an open, i.e., second position. In the closed position,

the clamps are substantially adjacent to the seat base, as is apparent in the below screenshot from NUNA0005232.



NUNA0005232 (first position) (annotated).

1240. In the open position, the clamps are at least partly displaced from the seat base in order to enable the second belt path to receive the belt, as is apparent in the below screenshot from NUNA0005232.



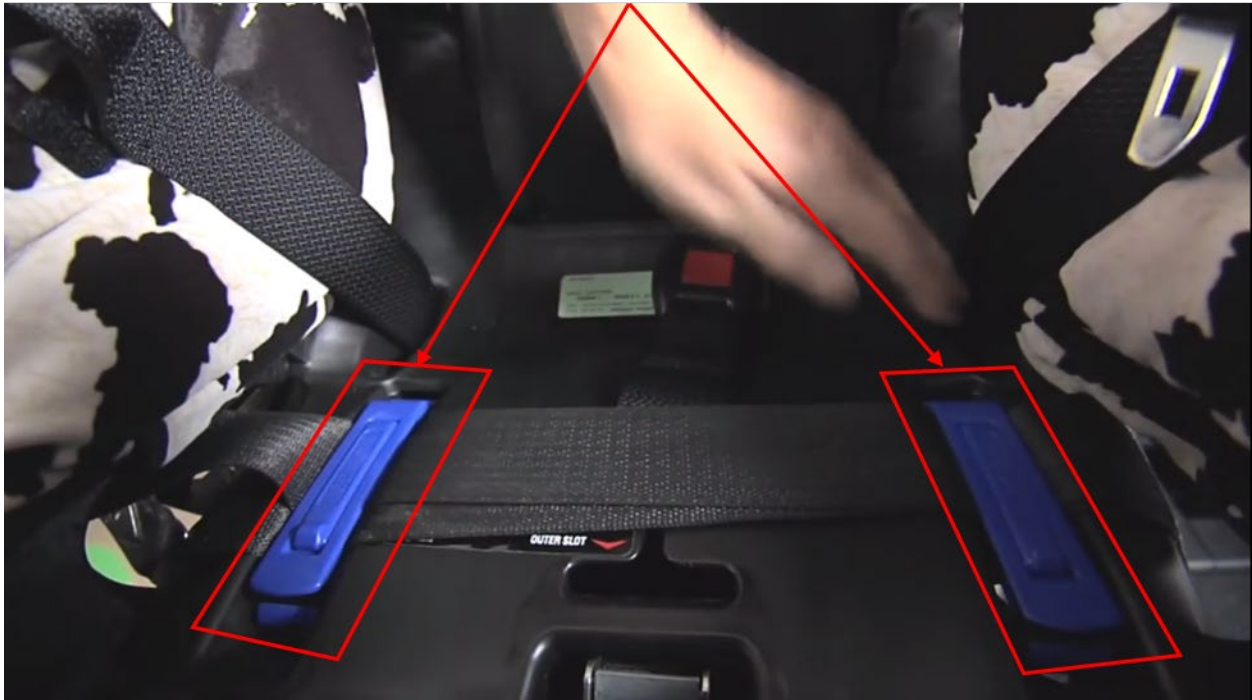
*Id.* (second position) (annotated).

- i. **[13(c)(1)] “the pivot structure having a second pivot portion comprising a third lateral edge member and a fourth lateral edge member,”**

1241. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 71; *id.*, Exhibit 3 at 87, the Boulevard 70 CS discloses the pivot structure having a second pivot portion comprising a third lateral edge member and a fourth lateral edge member.

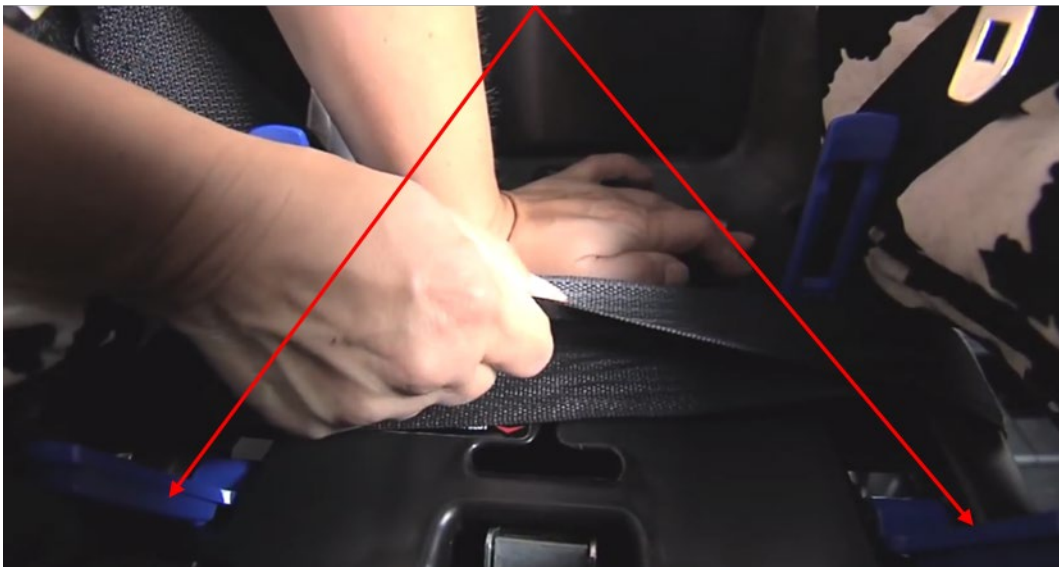
1242. As stated above in Section XI.A.4.f, the Boulevard 70 CS discloses that the clamps of each lock-off are a pivot structure. The blue clamps corresponding to the rear-facing belt path, depicted below in the screenshots from NUNA0005234, are a second pivot portion. One of the blue clamps is a third lateral edge member and the other blue clamp is a fourth lateral edge member.

Rear-Facing Lock-Offs



NUNA0005234 (annotated).

Clamps of Rear-Facing  
Lock-Offs



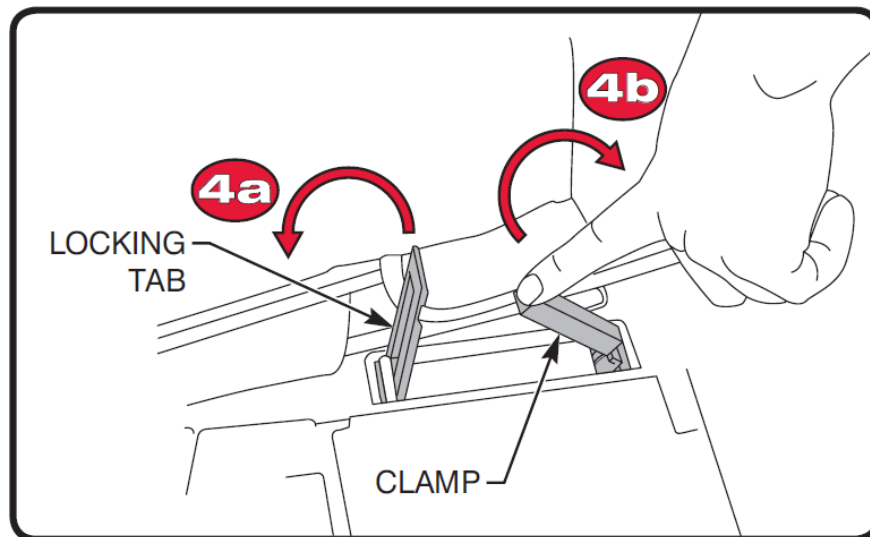
*Id.* (annotated).



- j. [13(c)(2)] “the third and fourth lateral edge members moving between a third position proximate to the seat portion and a fourth position at least partly displaced from the seat portion in order to enable the first belt path to receive the belt,”

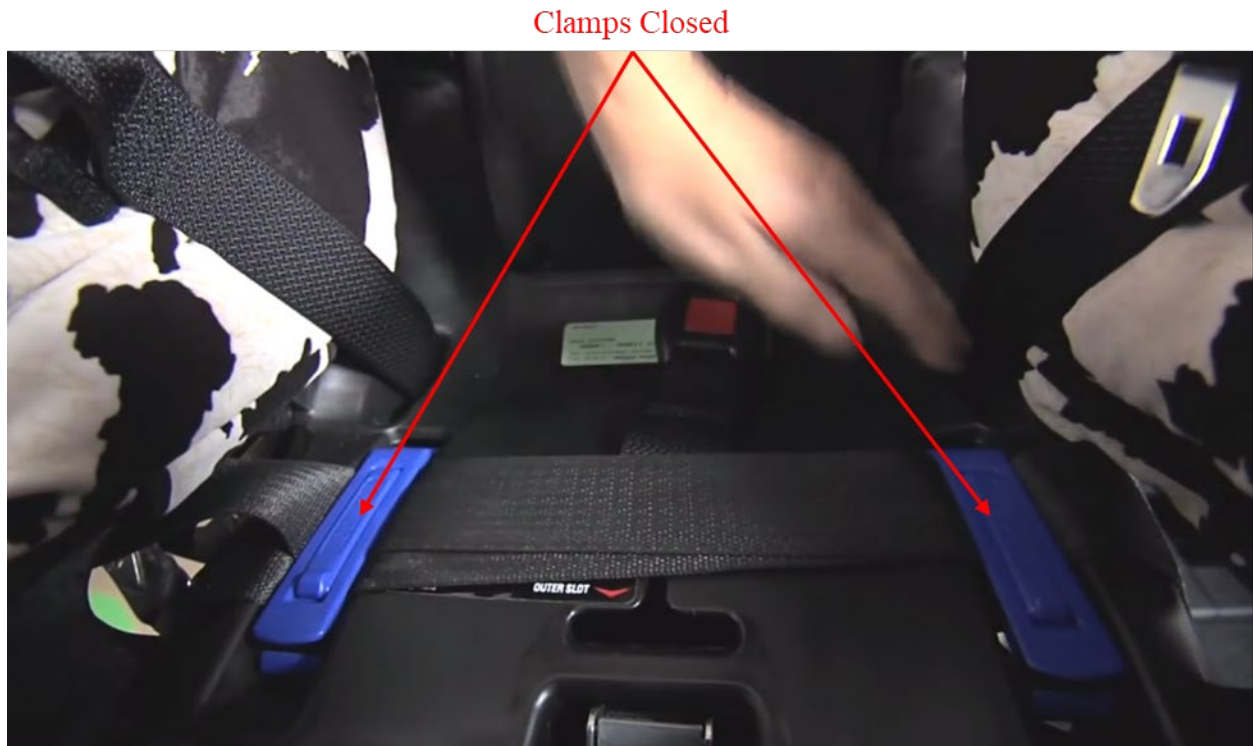
1243. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 72; *id.*, Exhibit 3 at 89, the Boulevard 70 CS discloses that the third and fourth lateral edge members moving between a third position proximate to the seat portion and a fourth position at least partly displaced from the seat portion in order to enable the first belt path to receive the belt.

1244. As stated above in Section XI.A.4.i, one of the blue clamps for the rear-facing belt path is a third lateral edge member and the other blue clamp is a fourth lateral edge member. As the depiction of the clamps in the User Guide reproduced below indicates, each clamp moves between an open, i.e., fourth position, and a closed, i.e., third position.



User Guide, 23.

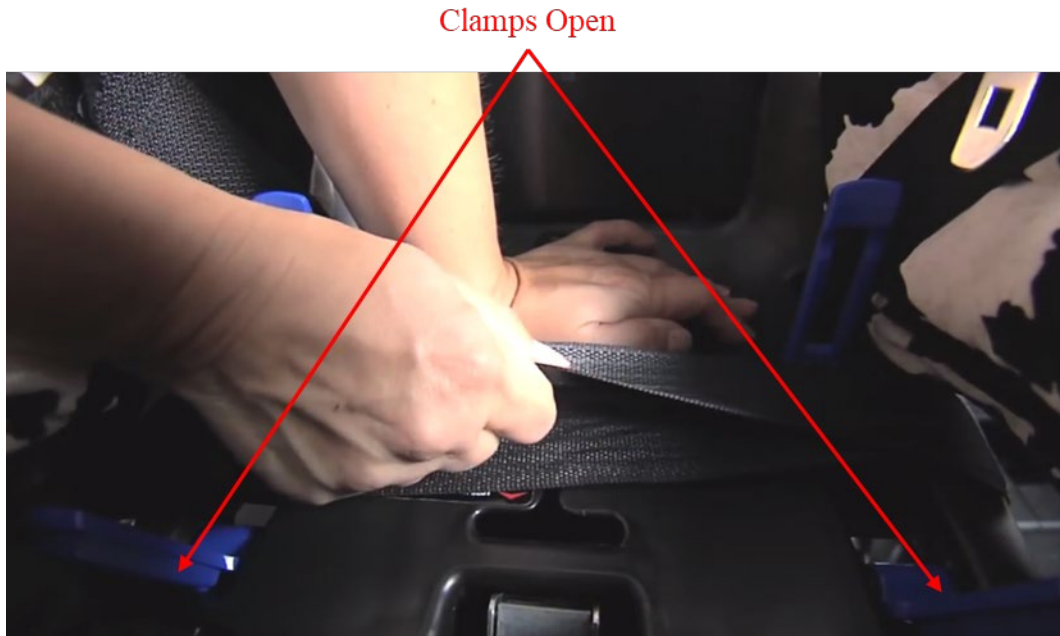
1245. The below screenshot from NUNA0005234 shows that the third position is proximate to the seat portion.



NUNA0005234 (third position) (annotated).

1246. The below screenshot from NUNA0005234 shows that the fourth position is at least partly displaced from the seat portion in order to enable the first belt path to receive the belt.





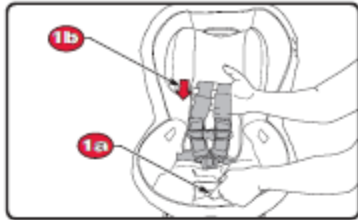
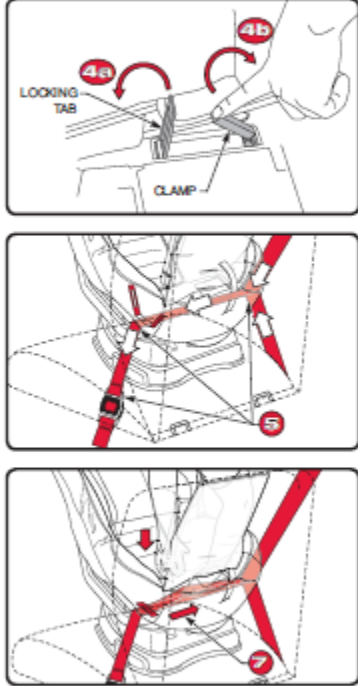

*Id.* (annotated).

- k. **[13(d)] “wherein the first belt path is configured to allow a user to position the belt to be displaced by the third and fourth lateral edge members relative to the third and fourth lateral edges to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation, and”**

1247. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 73; *id.*, Exhibit 3 at 90, the Boulevard 70 CS discloses that the first belt path is configured to allow a user to position the belt to be displaced by the third and fourth lateral edge members relative to the third and fourth lateral edges to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation.

1248. The User Guide for the Boulevard 70 CS provides instructions for the rear-facing orientation using the first belt path. User Guide, 22-23. Based on how Britax has interpreted this claim term in its infringement contentions, these instructions, which are reproduced below, indicate that the clamp displaces the belt relative to the third and fourth lateral edges to secure

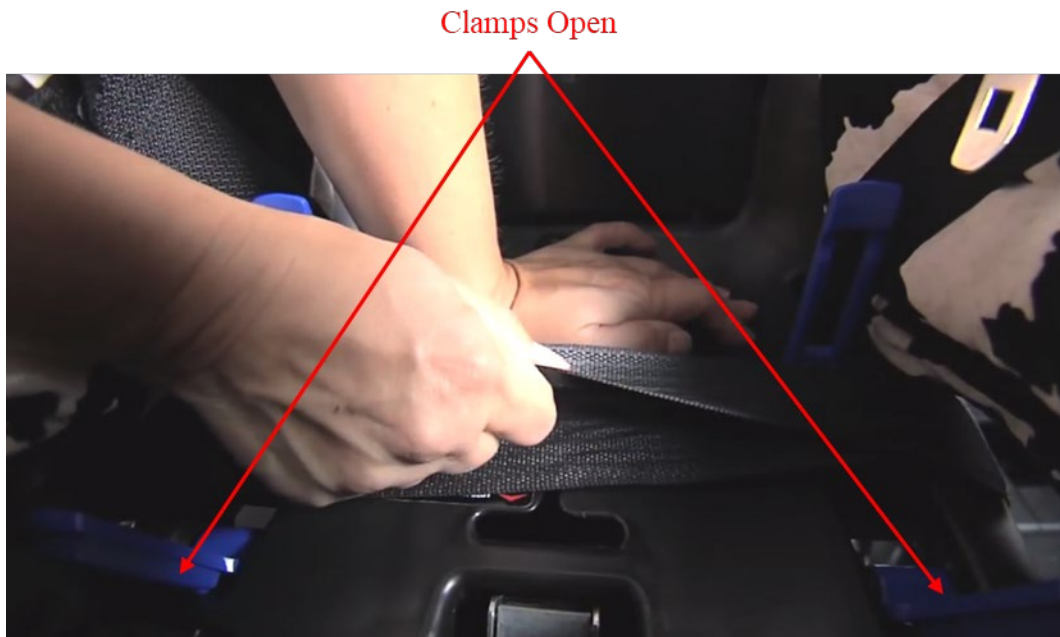
the child seat to the vehicle seat when the child seat is in the rear-facing orientation. For example, they instruct the user to “[c]lose the clamp over the vehicle belt.” User Guide, 23.

- 1** *Loosen the harness.*
    - a Lift harness adjuster lever
    - b Pull both harness straps forward
  - 2** *Remove the body pillow, unbuckle the harness, and remove the belly pad.*
  - 3** *Pull the head restraint cover up, then pull the seat cover forward while pulling the buckle through to access the rear-facing belt path.*
- 
- IMPORTANT:** *Ensure the buckle is in inner slot and lying away from the belt path.*
- 4** *Open the blue lock-off closest to where the vehicle belt will be buckled.*
    - a Open the locking tab
    - b Open the clamp
  - 5** *Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.*
  - 6** *Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.*
    - a Close the clamp over the vehicle belt
    - b Slide your palm or thumb along the locking tab until a click is heard (see page 14)
- 
- IMPORTANT:** *Both the vehicle lap and shoulder belts must be routed through the lock-off.*
- 7** *Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).*
  - 8** *Rear-facing installations can be improved by the use of the Versa-Tether (see pages 17 – 19).*
  - 9** *Pull the buckle up through its appropriate slot in the cover.*
  - 10** *Replace the cover and the belly pad.*
- 

*Id.*

1249. NUNA0005234 demonstrates that the child seat can be installed using both blue clamps, i.e., the third and fourth lateral edge members. The below screenshots from NUNA0005234 show that the blue clamps displace the belt relative to the third and fourth lateral

edges to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation.



NUNA0005234 (fourth position) (annotated).



Belt Deflected in  
Recesses of Lock-Offs

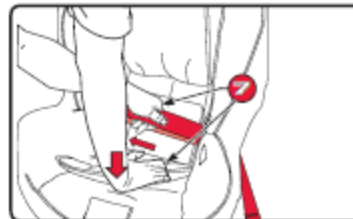
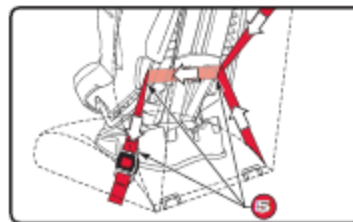
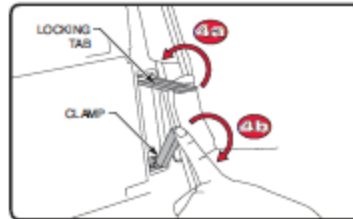
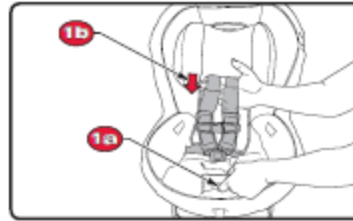
*Id.* (third position) (annotated).

- I. **[13(e)] “wherein the second belt path is configured to allow the user to position the belt to be displaced by the first and second lateral edge members relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.”**

1250. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 74; *id.*, Exhibit 3 at 92, the Boulevard 70 CS discloses that the second belt path is configured to allow the user to position the belt to be displaced by the first and second lateral edge members relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.

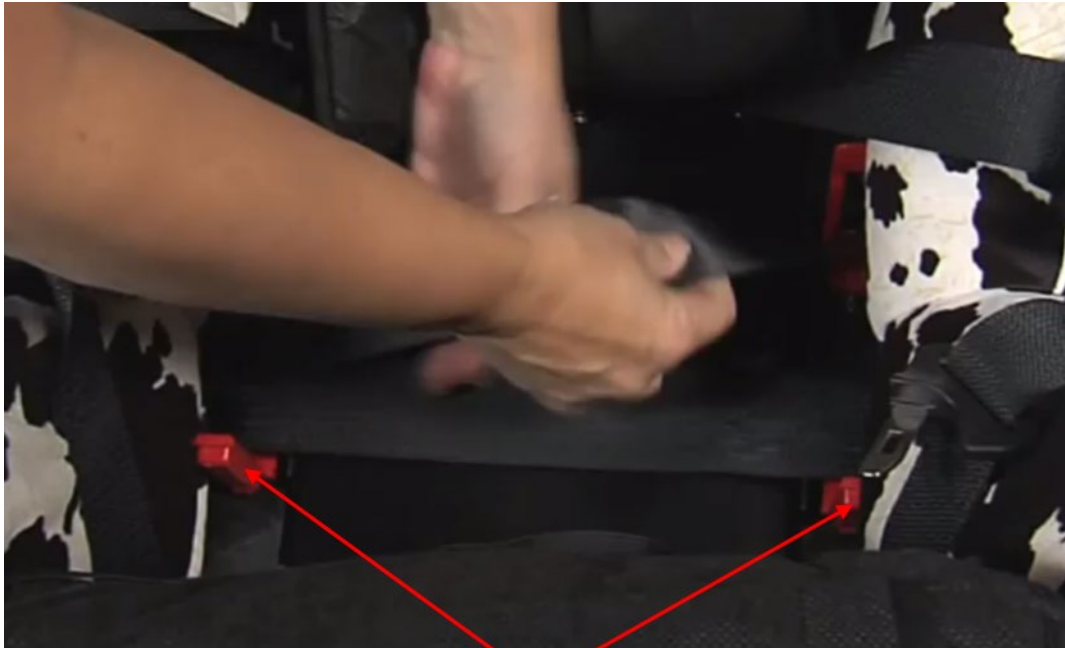
1251. The User Guide for the Boulevard 70 CS provides instructions for the forward-facing orientation using the second belt path. User Guide, 28-29. Based on how Britax has interpreted this claim term in its infringement contentions, these instructions, which are reproduced below, indicate that the clamp displaces the belt relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation. For example, they instruct the user to “[c]lose the clamp over the vehicle belt.” User Guide, 29.

- 1** Loosen the harness.
    - a Lift harness adjuster lever
    - b Pull both harness straps forward
  - 2** Remove the body pillow and unbuckle the harness.
  - 3** Pull the head restraint cover up, then pull the seat cover forward to access the forward-facing belt path.
  - 4** Open the red lock-off closest to where the vehicle belt will be buckled.
    - a Open the locking tab
    - b Open the clamp
  - 5** Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.
  - 6** Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.
    - a Close the clamp over the vehicle belt
    - b Slide your palm or thumb along the locking tab until a click is heard (see page 14)
- IMPORTANT:** Both the vehicle lap and shoulder belts must be routed through the lock-off.
- 7** Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).
  - 8** Attach the Versa-Tether to a designated anchor (see vehicle owner's manual) and remove all slack (see pages 17 – 19).
  - 9** Store the excess webbing in the elastic strap.
  - 10** Replace the cover.



*Id.*

1252. NUNA0005232 demonstrates that the child seat can be installed using both red clamps, i.e., the first and second lateral edge members. The below screenshots from NUNA0005232 show that the red clamps displace the belt relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.



Clamps Open

*Id.* (second position) (annotated).



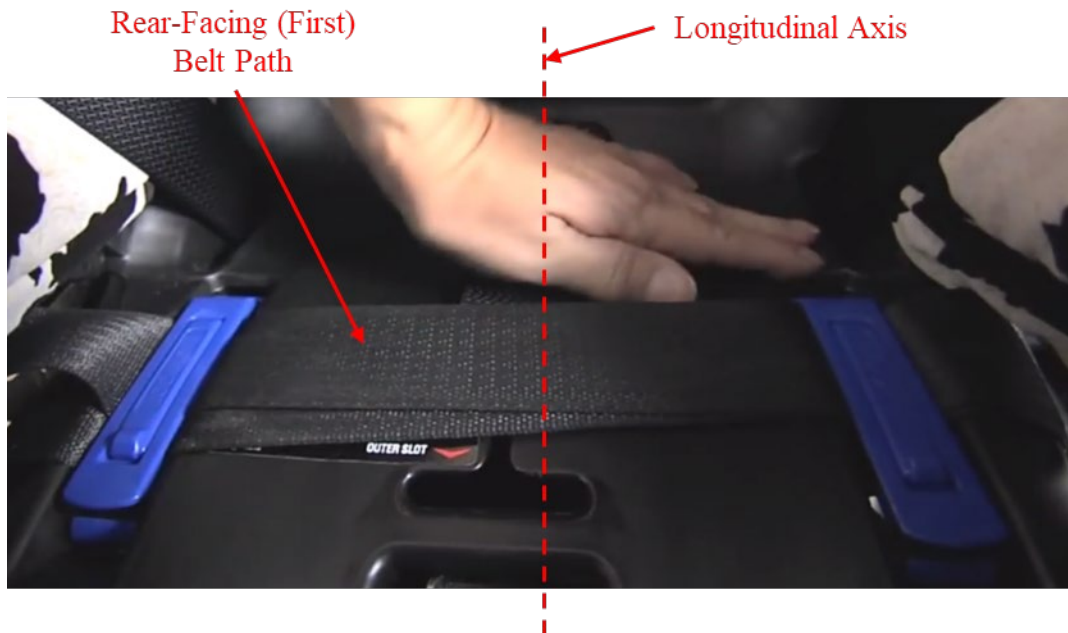
Belt Deflected in  
Recesses of Lock-Offs



NUNA0005232 (first position) (annotated).

**5. Dependent Claims 2, 7, 11, and 14: “wherein the first belt path extends transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base.”**

1253. For the reasons stated above in Sections XI.A.1, XI.A.2, XI.A.3, and XI.A.4, the Boulevard 70 CS discloses each limitation of claims 1, 5, 9, and 13, respectively, from which claims 2, 7, 11, and 14 depend, respectively. The Boulevard 70 CS further discloses the first belt path extends transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base. As discussed above in Section XI.A.1.d, the Boulevard 70 CS discloses that the rear-facing belt path is a first belt path. The screenshots reproduced below from NUNA0005234 depict the rear-facing belt path extending transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base.



NUNA0005234 (annotated).



Rear-Facing (First) Belt Path

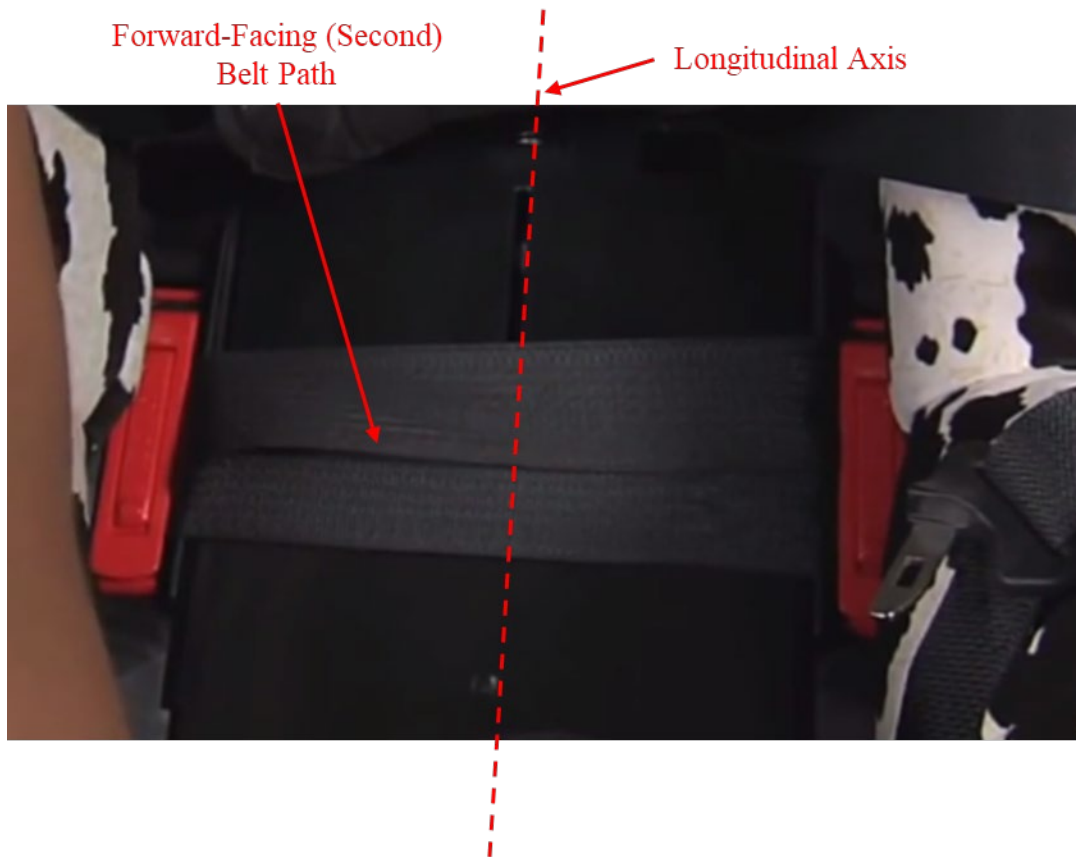
*Id.* (annotated).

6. **Dependent Claims 3, 8, 12, and 15: “wherein the second belt path extends transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base.”**

1254. For the reasons stated above in Sections XI.A.1, XI.A.2, XI.A.3, and XI.A.4, the Boulevard 70 CS discloses each limitation of claims 1, 5, 9, and 13, respectively, from which claims 3, 8, 12, and 15 depend, respectively. The Boulevard 70 CS further discloses the second belt path extends transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base. As discussed above in Section XI.A.1.e, the forward-facing belt path of the Boulevard 70 CS is a second belt path. The screenshots reproduced below from



NUNA0005232 depict the forward-facing belt path extending transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base.



NUNA0005232 (annotated).



Forward-Facing (Second)  
Belt Path

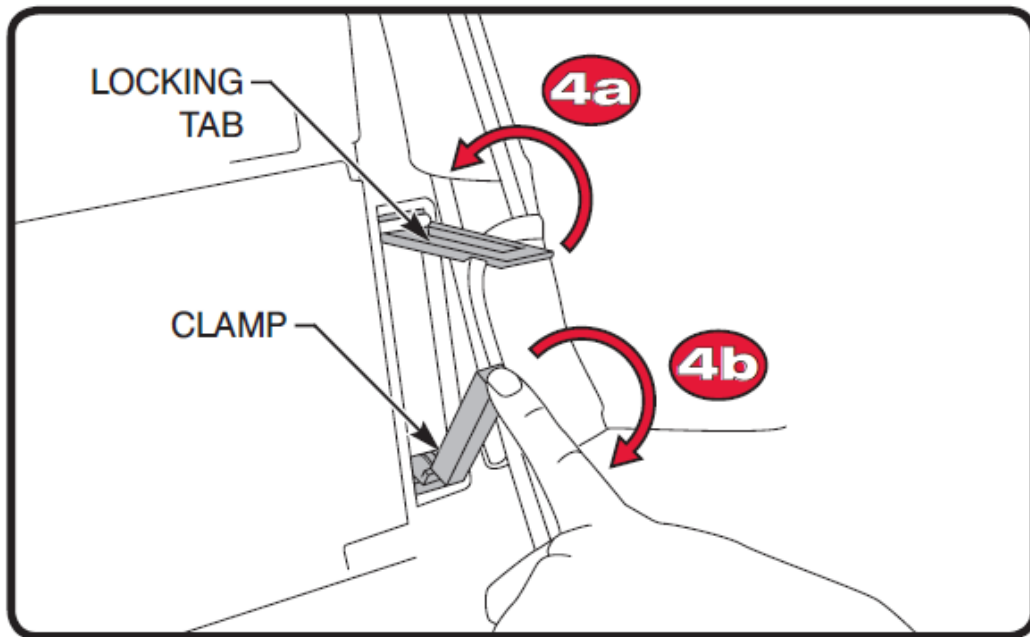
*Id.* (annotated).

7. **Dependent Claim 4: “wherein the tensioning mechanism is attached to the backrest portion so that the first and second edge surfaces are movable from the second position to the first position in response to receipt of a substantially vertical force.”**

1255. For the reasons stated above in Section XI.A.1, the Boulevard 70 CS discloses each limitation of claim 1, from which claim 4 depends. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 21; *id.*, Exhibit 3 at 23, the Boulevard 70 CS further discloses the tensioning mechanism is attached to the backrest portion so that the first and second

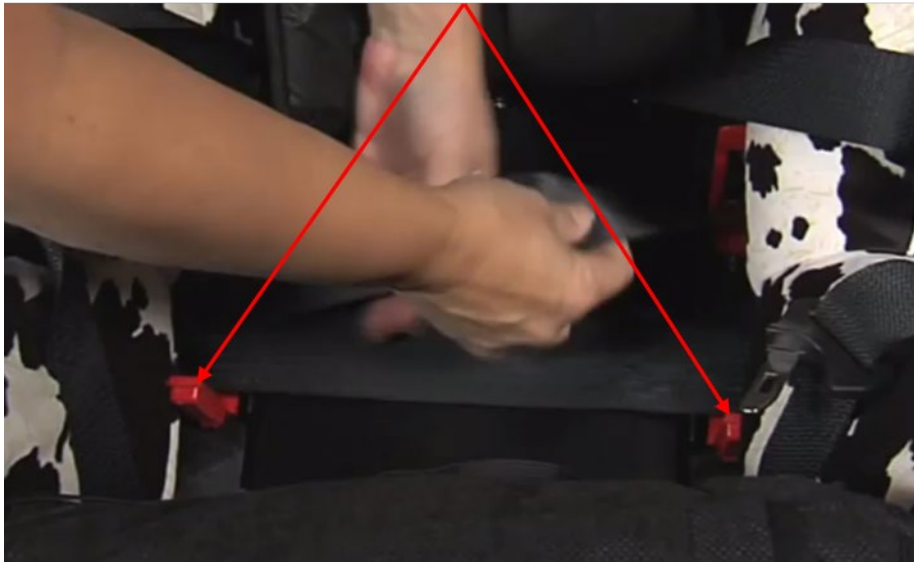
edge surfaces are movable from the second position to the first position in response to receipt of a substantially vertical force.

1256. As stated above in Section XI.A.1.g, the red clamps of the tensioning mechanism are attached to the backrest portion and rotate between a first position and a second position. This is shown, for example, in the portion of the User Guide and NUNA0005232 reproduced below, which depict the clamp of a forward-facing lock-off attached to the backrest portion.



User Guide, 29 (red arrows depicting rotation).

Clamps of Forward-Facing Lock-Offs



NUNA0005232 (annotated).

1257. A POSA would have understood from the above pictures and from viewing the installation of the Boulevard 70 CS in NUNA0005232 that a substantially upward vertical force on the open red clamps would move the clamps from the second position to the first position.

#### 8. Dependent Claim 6

1258. For the reasons stated above in Section XI.A.2, the Boulevard 70 CS discloses each limitation of claim 5, from which claim 6 depends.

- a. **[6(a)] “wherein the first belt path is configured to allow a user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation,”**

1259. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 39; *id.*, Exhibit 3 at 47, the Boulevard 70 CS discloses that the first belt path is configured to allow a user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in

the rear-facing orientation for the reasons stated above in Section XI.A.1.k with respect to limitation 1(c)(1), which discusses the installation of the child seat in the rear-facing orientation using the lap and shoulder belt and the blue clamps, which include the first and second rigid edge surfaces, as discussed in Section XI.A.2.h.

- b. [6(b)] “wherein the second belt path is configured to allow the user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.”**

1260. In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 39; *id.*, Exhibit 3 at 47, the Boulevard 70 CS discloses that the second belt path is configured to allow the user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation for the reasons stated above in Section XI.A.1.l, which discusses the installation of the child seat in the forward-facing orientation using the lap and shoulder belt and the red clamps, which include the first and second rigid edge surfaces, as discussed in Section XI.A.2.h.

## **9. Dependent Claim 10**

1261. For the reasons stated above in Section XI.A.3, the Boulevard 70 CS discloses each limitation of claim 9, from which claim 10 depends.

- a. [10(a)] “wherein the first belt path is configured to allow a user to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation,”**

1262. Limitation 10(a) is substantially identical to limitation 6(a), except that limitation 10(a) refers to a “vehicle belt” instead of “the lap section and the should section of the vehicle

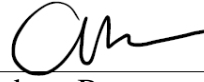
belt” and uses the term “first and second lateral edge surfaces” instead of “first and second rigid edge surfaces.” In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 58; *id.*, Exhibit 3 at 71, for the same reasons discussed above in Section XI.A.8.a with respect to limitation 6(a), the Boulevard 70 CS discloses the first belt path is configured to allow a user to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation.

- b. [10(b)] “wherein the second belt path is configured to allow the user to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.”**

1263. Limitation 10(b) is substantially identical to limitation 6(b), except that limitation 10(a) refers to a “vehicle belt” instead of “the lap section and the should section of the vehicle belt” and uses the term “first and second lateral edge surfaces” instead of “first and second rigid edge surfaces.” In view of Britax’s apparent construction of this claim phrase in its infringement contentions, *see* Britax’s Supplemental Infringement Contentions, Exhibit 1 at 59; *id.*, Exhibit 3 at 72, for the same reasons discussed above in Section XI.A.8.b with respect to limitation 6(b), the Boulevard 70 CS discloses the second belt path is configured to allow the user to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.

Executed this 27<sup>th</sup> day of April, 2020.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Andrew Bowman', written over a horizontal line.

Andrew Bowman